

2020 Credit Reporting Resource Guide®

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Responsibilities and Roles

RESPONSIBILITIES

Credit reporting information is sensitive data. The issues of accuracy and completeness of information and fairness to consumers are not just a concern of the consumer reporting agencies; credit grantor participation is also required. Federal and state laws already regulate certain aspects of credit reporting. In order to protect your ability to conduct business without the further intervention of external forces, you must participate in the accuracy process.

Both credit grantors and consumers depend on consumer reporting agencies to acquire and maintain accurate credit histories. This can only be accomplished if the provider of consumer data understands the tools that are available and adheres to the standards for credit reporting.

The purpose of this guide is to document this very important process and includes:

- Industry Standards
- Metro 2® Format
- Metro 2® Validation/Implementation Checklist
- Automated Universal Data Process
- Automated Consumer Dispute Verification

The Metro 2® Format Task Force strongly encourages you to make the fullest use of the tools and procedures outlined in this guide, and to contact the consumer reporting agencies at any time for whatever assistance you may need.

Responsibilities and Roles

ROLES

Consumer Data Industry Association (CDIA)

An international trade association representing the consumer credit, mortgage reporting, employment and tenant screening and collection service industries. Headquartered in Washington, DC, CDIA provides legislative assistance and a lobbying function to its members, and works with the consumer reporting agencies to establish standards for the consumer reporting industry.

For more information about CDIA, visit their website at www.cdiaonline.org.

Consumer Reporting Agencies

Individual companies that collect, store, maintain and distribute information on consumer credit history.

For more information about the agencies, visit their websites at:

www.equifax.com

www.experian.com

www.innovis.com

www.transunion.com

Metro 2® Format Task Force

Despite the competitive and organizational barriers within the credit industry, the consumer reporting agencies continue to work together to develop, maintain and enhance an industry-standard reporting format. The task force's mission is to provide a standardized method for the reporting of accurate, complete and timely data.

The Metro 2® Format Task Force is comprised of representatives from Equifax, Experian, Innovis and TransUnion and is supported by the CDIA.

For information specific to data reporting, click on the Metro 2® option at www.cdiaonline.org.

Responsibilities and Roles

e-OSCAR® System Support Team

This group maintains an industry-wide automated consumer dispute resolution system, which is required by the Fair Credit Reporting Act (FCRA) section 611 (a) (5) (D). This team includes representatives from Equifax, Experian, Innovis and TransUnion.

For information specific to consumer disputes, click on the e-OSCAR® option at www.cdiaonline.org.

Data Furnisher

Company who provides consumer credit accounts receivables to one or more consumer reporting agency.

Duties of furnishers are described in FCRA (section 623). See <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/credit-reporting> for additional information.

Consumer Financial Protection Bureau (CFPB) Among its responsibilities, the CFPB writes rules under and enforces the FCRA, and takes consumer complaints related to the FCRA. More information can be found on the internet at <https://www.consumerfinance.gov/policy-compliance/guidance/other-applicable-requirements/fair-credit-reporting-act/>.

Federal Trade Commission (FTC)

Under the FCRA (section 621), the FTC is charged with enforcing and interpreting the Fair Credit Reporting Act. As such, they issue staff opinion letters, press releases and consumer educational materials. More information can be found on the Internet at <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/credit-reporting>.

Automated Data Reporting

FEATURES OF THE METRO 2® FORMAT

- Accepted by all consumer reporting agencies, the Metro 2® Format enables the reporting of accurate, complete and timely credit information.
- Meets all requirements of the Fair Credit Billing Act (FCBA), the Fair Credit Reporting Act (FCRA), the Equal Credit Opportunity Act (ECOA) and all applicable state laws.
- Allows credit information to be added and mapped to the consumer's file with greater consistency.
- Allows complete identification information to be reported for each consumer (including co-debtor, co-signer, etc.) each month which improves the ability of the consumer reporting systems to match to the correct consumer.
- Accommodates cycle reporting of data, which allows more timely updating of the credit file.
- The Payment History Profile (up to 24 months) makes it possible for the credit grantor to supply automated updates/corrections for the file rather than costly manual updates/corrections, and reduces consumer disputes.
- Flexibility of the format provides for future enhancements.

Reporting in the Metro 2® Format greatly benefits the credit grantor, the consumer reporting agencies and your customer, the consumer.

Automated Data Reporting

INDUSTRY REPORTING STANDARDS

An industry standard for reporting consumer accounts will ensure the integrity and consistency of the credit information being reported.

- All accounts must be reported a minimum of once per month.
- A final Account Status Code must be reported when the accounts are ultimately paid or closed with a zero balance.
- If reporting by cycles, all accounts must be reported at the close of each cycle.
- When reporting delinquent accounts, the "Industry Standard for Reporting Account Delinquency" must be followed.

INDUSTRY STANDARD FOR REPORTING ACCOUNT DELINQUENCY

The "clock" for a 30-day delinquency starts 30 days after the **due date**, as opposed to the billing date.

The following example tracks an account history for four months, specifying the Metro 2® Account Status Code that should be reported. The Due Date for this example is the 15th of each month.

Date of Acct. Info.	Jan 1	Feb 1	Mar 1	Apr 1
Bills Received	1	2	3	4
Payments Past Due	0	1	2	3
# Days Past Due Date	0	17	45	76
Metro 2 Status Code	11	11	71	78

Definitions:

Metro 2® Status Code 11	0-29 days past due date
Metro 2® Status Code 71	30-59 days past due date
Metro 2® Status Code 78	60-89 days past due date

Automated Data Reporting

ACCURACY AND INTEGRITY DEFINITIONS

The 2010 FACT Act Data Furnisher rules define the term “Accuracy” to mean that information that a furnisher provides to a consumer reporting agency about an account or other relationship with the consumer correctly:

- Reflects the terms of and liability for the account or other relationship;
- Reflects the consumer’s performance and other conduct with respect to the account or other relationship; and
- Identifies the appropriate consumer.

The term “Integrity” means that information that a furnisher provides to a consumer reporting agency about an account or other relationship with the consumer:

- Is substantiated by the furnisher’s records at the time it is furnished;
- Is furnished in a form and manner that is designed to minimize the likelihood that the information may be incorrectly reflected in a consumer report; and
- Includes the credit limit, if applicable and in the furnisher’s possession.

MAINTAINING ACCURACY, INTEGRITY AND CONSISTENCY OF CREDIT INFORMATION

Once information is reported accurately, it is important that data furnishers not ask for a subsequent change in the history payment record unless the payment history is inaccurate.

- Consumer credit history information will be reported in a factual, precise and objective manner.
- Only inaccurately reported accounts should be deleted. Paid derogatory accounts, such as collections or charge offs, should be reported as paid; they should not be deleted.
- Requests by consumers for re-verification of challenged information must be processed promptly.
- Unless an error is discovered, the consumer will be advised that the factual credit history will continue to be reported.

Quick Reference Guides to Industry Standards

Banking / Savings & Loan / Credit Union – Installment Loan & Line of Credit

While all applicable fields with the Metro 2® Format should be reported, these guidelines provide specific values that apply to Installment Loans and Lines of Credit.

Important Note: Refer to Credit Cards (non-Retail), Student Loans and Mortgages for guidelines specific to reporting those types of accounts.

Field	Segment/ Field #		
Portfolio Type	Base/8	I (Installment)	C (Line of Credit)
Account Type	Base/9	00 – 05, 10, 11, 13, 17, 20, 90, 91, 95, 0A, 3A, 6A, 9A, 7B, 0F	15, 43, 47, 7A, 9B
Credit Limit	Base/11	Zero fill	Assigned credit limit
Highest Credit/Original Loan Amount	Base/12	Original amount of the loan, excluding interest payments	Highest amount of credit utilized by the consumer
Terms Duration	Base/13	Number of months of the loan	Constant of 'LOC'
Scheduled Monthly Payment Amount	Base/15	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due
Account Status	Base/17A	11, 13, 61 – 64, 71, 78, 80, 82 – 84, 93, 95 – 97, DA, DF	11, 13, 62, 64, 71, 78, 80, 82 – 84, 93, 97, DA, DF
Special Comment	Base/19	Closed accounts = I Leasing = BB – BK, BS (Require Account Type Code 13 or 3A) Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BN, BP, BT, CP Transferred = H, O, AH, AN, AT, BA Other = S, V, AV, AW, AZ, CH, CM, CN, CO Removal of comment = blank	Closed accounts = M, AP, CI, CJ, CL Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, AX, BP, BT, CP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, CH, CK, CM, CN, CO Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XA – XJ, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Code 3 (Authorized User) is not applicable.	1 – 3, 5, 7, T, X, W, Z

Child Support Agencies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Child Support Agencies' accounts.

Field	Segment/ Field #	
Portfolio Type	Base/8	O (Open)
Account Type	Base/9	50, 93
Date Opened	Base/10	Date the case was initiated with the state agency
Highest Credit/Original Loan Amount	Base/12	Zero fill
Terms Duration	Base/13	Constant of 001
Current Balance	Base/21	Total amount due from outstanding support payments. This amount must equal, at a minimum, one scheduled monthly payment amount.
Scheduled Monthly Payment Amount	Base/15	The monthly debt obligation
Account Status	Base/17A	Able to Age Account History: 11, 13, 62, 71, 78, 80, 82 – 84, 93, DA Unable to Age Account History: 11, 13, 62, 93, DA
FCRA Compliance / Date of First Delinquency	Base/25	Activity Date – because each month begins a new obligation. Note: This date must freeze when the child or youngest child, in the case of multiple children, reaches the age of majority or emancipation, or the statute of limitations in that state has been reached.
Special Comment	Base/19	Code 'CS' is used to overlay the Date of First Delinquency each month when reporting delinquent and collection account statuses because each month begins a new obligation. Other applicable comments are: Legal Action = AM Special Payment Arrangements = B, AC, AI Transferred = O Other = S, V, AW Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XH, XR
ECOA Code	Base/37 J1 & J2/10	1 (Individual)
Consumer Information Indicator	Base/38 J1 & J2/11	T and U only (Note: Bankruptcy, Personal Receivership and Reaffirmation of Debt codes are not applicable.)

Credit Cards (non-Retail Cards)

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Credit Cards.

Field	Segment/ Field #		
Portfolio Type	Base/8	R (Revolving)	O (Open)
Account Type	Base/9	18, 37, 2A, 8A, 0G	18, 37, 2A, 8A
Credit Limit	Base/11	Assigned credit limit	Assigned credit limit, if applicable. Otherwise, zero fill.
Highest Credit/Original Loan Amount	Base/12	Highest amount of credit utilized by the consumer	Highest amount of credit utilized by the consumer
Terms Duration	Base/13	'REV' (for revolving payments)	'001' (for one payment due as scheduled)
Scheduled Monthly Payment Amount	Base/15	Minimum amount due based on the balance, not including any amounts past due	Zero fill
Account Status	Base/17A	11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF	11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF
Special Comment	Base/19	Closed accounts = M, AP, BL, CI Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AU, AX, BP, BT, CP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, CH, CN, CO Removal of comment = blank	Closed accounts = M, AP, BL, CI Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AU, BP, CP Transferred = AT, O, AH, AN, BA Other = S, V, AV, AW, CH, CN, CO Removal of comment = blank

Debt Buyers / Collection Agencies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Debt Buyer and Collection Agency accounts.

Field	Segment/ Field #	Debt Buyer/Collection Agency	Returned Checks
Portfolio Type	Base/8	O (Open)	O (Open)
Account Type	Base/9	48, 0C	77
Date Opened	Base/10	Date the account was purchased by the debt buyer or placed/assigned to the third party collection agency	Date of the check
Highest Credit/Original Loan Amount	Base/12	Original assigned amount as of the date purchased, placed or assigned	Original amount of the check, excluding fees and interest
Terms Frequency	Base/14	Blank fill	Blank fill
Account Status	Base/17A	62, 93, DA, DF (Note: Paid in full collection accounts must not be deleted.)	62, 93, DA, DF (Note: Paid in full collection accounts must not be deleted.)
FCRA Compliance / Date of First Delinquency	Base/25	Date of the first delinquency with the original creditor that led to the account being sold or placed for collection	Date the check was returned for non-sufficient funds. If not available, the date of the check is acceptable.
Special Comment	Base/19	Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AU, BP Other = S, V, AW Removal of comment = blank	Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AU, BP Other = S, V, AW Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XB, XC, XF, XG, XH, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Codes 3 and X are not applicable.	ECOA Codes 3, 5, 7 and X are not applicable.
K1 Segment	K1/2 K1/3	Original credit grantor's name Creditor Classification = 01–15 are required. Note: 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.	Original Creditor = Name of the payee Creditor Classification = 01–15 are required. Note: 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.

Loan Finance Companies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Loan Finance companies' accounts.

Important Note: Refer to Credit Cards (non-Retail) and Student Loan Reporters for guidelines specific to reporting those types of accounts.

Field	Segment/ Field #		
Portfolio Type	Base/8	I (Installment)	C (Line of Credit)
Account Type	Base/9	00 – 05, 10, 11, 13, 17, 20, 90, 91, 95, 0A, 3A, 6A, 9A, 7B, 0F	15, 43, 47, 7A, 9B
Credit Limit	Base/11	Zero fill	Assigned credit limit
Highest Credit/Original Loan Amount	Base/12	Original amount of the loan, excluding interest payments	Highest amount of credit utilized by the consumer
Terms Duration	Base/13	Number of months of the loan	Constant of 'LOC'
Scheduled Monthly Payment Amount	Base/15	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due
Account Status	Base/17A	11, 13, 61 – 64, 71, 78, 80, 82 – 84, 93, 95 – 97, DA, DF	11, 13, 62, 64, 71, 78, 80, 82 – 84, 93, 97, DA, DF
Special Comment	Base/19	Closed accounts = I Leasing = BB – BK, BS (Require Account Type Code 13 or 3A) Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BN, BP, BT, CP Transferred = H, O, AH, AN, AT, BA Other = S, V, AV, AW, AZ, CH, CM, CN, CO Removal of comment = blank	Closed accounts = M, AP, CI, CJ, CL Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, AX, BP, BT, CP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, CH, CK, CM, CN, CO Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XA – XJ, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Code 3 (Authorized User) is not applicable.	1 – 3, 5, 7, T, X, W, Z

Mortgage Lending

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Mortgage lending.

Field	#			
Portfolio Type	8	M (Mortgage)	I (Installment)	C (Line of Credit)
Account Type	9	19, 25, 26, 5A, 5B, 6B, 2C, 08	04, 05, 17, 0A, 9A, 6D, 0F	89
Credit Limit	11	Zero fill	Zero fill	Assigned credit limit
Highest Credit or Original Loan Amt.	12	Original amount of the loan, excluding interest payments	Original amount of the loan, excluding interest payments	Highest amount of credit utilized by the consumer
Terms Duration	13	Number of years of the loan	Number of months of the loan	Constant of 'LOC'
Scheduled Monthly Payment Amount	15	Regular monthly payment, including principal, interest & escrow	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due
Account Status	17A	11, 13, 65, 71, 78, 80, 82-84, 89, 94, DA, DF • 88 (for HUD FHA Title 1 loans) • 97 (Only report when the account does not go through the foreclosure process; but the remaining balance is charged off. If the remaining charged off balance is paid, report Account Status 64.) Note: 97 should not be reported when deficiency balance is charged off. If the lien has been released, report the mortgage as paid.	11, 13, 61-64, 71, 78, 80, 82-84, 93, 95-97, DA, DF 89 and 94 (only for Type 6D Home Equity loans that go through the deed in lieu or foreclosure process)	11, 13, 62, 64, 65, 71, 78, 80, 82-84, 89, 93, 94, 97, DA, DF

Mortgage Lending (continued on next page)

Mortgage Lending

Continued from previous page

Field	#			
Portfolio Type	8	M (Mortgage)	I (Installment)	C (Line of Credit)
Special Comment	19	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, BP, BT, CP Transfer = AT, H, O, AH, AN, BA Other = S, V, AV, AW, BO, CH, CM, CN, CO Removal of comment = blank	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, AX, BN, BP, BT, CP Transfer = AT, H, O, AH, AN, BA Other = S, V, AV, AW, CH, CM, CN, CO Removal of comment = blank	Closed = M, AP, CJ, CL Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, BP, BT, CP Transfer = AT, O, AH, AN, BA Other = S, V, AV, AW, BO, CH, CK, CM, CN, CO Removal of comment = blank
Compliance Condition Code	20	XB, XC, XF, XG, XH, XR	XB, XC, XF, XG, XH, XR	XA – XJ, XR
Interest Type Indicator	28	F (Fixed) or V (Variable/Adjustable)	If applicable, F (Fixed) or V (Variable/Adjustable)	If applicable, F (Fixed) or V (Variable/Adjustable)
ECOA Code	37 J1/J2 -10	ECOA Code 3 (Authorized User) is not applicable.	ECOA Code 3 (Authorized User) is not applicable.	ECOA Code 3 (Authorized User) is not applicable.
K3 Segment Mortgage Information	2 3 4	Agency Identifier = 01 (Fannie Mae) & 02 (Freddie Mac) Secondary Agency Account No. Mortgage Identification Number	Segment not applicable	Segment not applicable
K4 Segment (when loan has a balloon payment)	2 4 5	Specialized Payment Indicator = 01 Balloon Payment Due Date Balloon Payment Amount	Specialized Payment Indicator = 01 Balloon Payment Due Date Balloon Payment Amount	Specialized Payment Indicator = 01 Balloon Payment Due Date Balloon Payment Amount
K4 Segment (when loan is in deferment)	2 3	Specialized Payment Indicator = 02 Deferred Payment Start Date	Specialized Payment Indicator = 02 Deferred Payment Start Date	Specialized Payment Indicator = 02 Deferred Payment Start Date

Retail Accounts (store exclusive)

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Retail accounts.

Field	Segment/ Field #		
Portfolio Type	Base/8	R (Revolving)	I (Installment)
Account Type	Base/9	07	06
Credit Limit	Base/11	Assigned credit limit	Zero fill
Highest Credit/Original Loan Amount	Base/12	Highest amount of credit utilized by the consumer	Original amount of the loan, excluding interest payments
Terms Duration	Base/13	Constant of 'REV'	Number of months of the loan
Scheduled Monthly Payment Amount	Base/15	Minimum amount due based on the balance, not including any amounts past due	Regular monthly payment
Account Status	Base/17A	11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF	11, 13, 61 - 64, 71, 78, 80, 82-84, 93, 95 - 97, DA, DF
Special Comment	Base/19	Closed accounts = M, AP, BL, CI Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BP, BT, CP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank	Closed accounts = I Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BP, BT, CP Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank
Compliance Condition Code	Base/20	XA – XJ, XR	XB, XC, XF, XG, XH, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Codes 5 and 7 are not applicable.	ECOA Code 3 is not applicable.

Sales Finance Companies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Sales Finance companies' accounts.

Field	Segment/ Field #		
Portfolio Type	Base/8	I (Installment Loan)	R (Revolving)
Account Type	Base/9	00 – 03, 06, 11, 13, 17, 3A, 7B	07
Credit Limit	Base/11	Zero fill	Assigned Credit Limit
Highest Credit/Original Loan Amount	Base/12	Original amount of the loan, excluding interest payments	Highest amount of credit utilized by the consumer
Terms Duration	Base/13	Number of months of the loan	'REV' (for revolving payments)
Scheduled Monthly Payment Amount	Base/15	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due
Account Status	Base/17A	11, 13, 61 – 64, 71, 78, 80, 82 – 84, 93, 95 – 97, DA, DF	11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF
Special Comment	Base/19	Closed accounts = I Leasing = BB – BK, BS (Require Account Type Code 13 or 3A) Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BN, BP, BT, CP Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH, CN, CO Removal of comment = blank	Closed accounts = M, AP, BL, CI Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BP, BT, CP Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH, CN, CO Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XA – XJ, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Code 3 is not applicable.	ECOA Codes 5 and 7 are not applicable.

Student Loan Reporters – Federal Loans

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Federal Student Loans. Refer to the Federal Loans section of the Student Loan Reporting module for additional details.

Field	Segment/ Field #	Lender/Service/Secondary Market	Post-Default Loans
Portfolio Type	Base/8	I (Installment Loan)	O (Open)
Account Type	Base/9	12 (Education)	12 (Education)
Date Opened	Base/10	Date the account was originally opened	Date the defaulted claim was paid to the lender
Highest Credit / Orig. Loan Amt.	Base/12	Original amount of the loan, excluding interest payments	Claim amount that was paid to the lender
Terms Duration	Base/13	<ul style="list-style-type: none"> Maximum number of months allowed for repayment of the loan When payments are not required (initial in-school, grace, deferment, forbearance), report Blank. When loans no longer guaranteed and in collections, report '001'. 	'001' (for one payment due as scheduled)
Terms Freq.	Base/14	M (monthly) or D (deferred), as applicable	Blank fill
Scheduled Monthly Payment Amt.	Base/15	<ul style="list-style-type: none"> Monthly payment amount for repayment plan in which borrower is enrolled during current reporting period For loans in IDR plan, amount the consumer is required to pay for each month in the IDR plan, which can be as low as \$0 	Zero fill
Account Status	Base/17A	<ul style="list-style-type: none"> 11, 13, 78, 80, 82 – 84, DA, DF For loans no longer guaranteed: 62, 64, 93, 97 	62, 93, DA, DF
Special Comment	Base/19	Special Payment Arrangements = AU Transferred = O, AH, AT Other = AW Removal of comment = blank	Legal Action = AM Special Payment Arrangements = B, C, AC, AI, AU Other = S, V, AW Removal of comment = blank
Compliance Cond. Code	Base/20	XB, XC, XH, XR	XB, XC, XH, XR
ECOA Code	Base/37 J1/J2/10	ECOA Code 3 is not applicable.	ECOA Code 3 is not applicable.
K1 Segment	K1/2 K1/3	Segment not applicable	Complete name of the lender to whom the claim was paid & Creditor Classification = 07
K4 Segment (deferment or forbearance)	K4/2 K4/3	Specialized Payment Indicator = 02 Deferred Payment Start Date = date the first payment is due. If not available, date on which the deferred/forbearance period will end.	Segment not applicable

Student Loan Reporters – Private Loans

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Private Student Loans.

Field	Segment/ Field #	Installment	Line of Credit
Portfolio Type	Base/8	I (Installment Loan)	C (Line of Credit)
Account Type	Base/9	12 (Education)	15 (Line of Credit)
Credit Limit	Base/11	Zero fill	Assigned credit limit
Highest Credit / Orig. Loan Amt.	Base/12	Original amount of the loan, excluding interest payments	Highest amount of credit utilized by the consumer
Terms Duration	Base/13	Number of months of the loan	Constant of 'LOC'
Terms Freq.	Base/14	M (monthly) or D (deferred)	M (monthly) or D (deferred)
Scheduled Monthly Payment Amt.	Base/15	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due
Account Status	Base/17A	11, 13, 62, 64, 71, 78, 80, 82 – 84, 93, 97, DA, DF	11, 13, 62, 64, 71, 78, 80, 82 – 84, 93, 97, DA, DF
Special Comment	Base/19	Legal Action = AM; Refinanced = AS Special Payment Arrangements = AC, AU, BT Transferred = O, AH, AT Other = AW, CH, CO Removal of comment = blank	Closed = M, AP, CJ; Legal Action = AM Special Payment Arrangements = AC, AU, BT Transferred = O, AH, AT Other = AW, CH, CO Removal of comment = blank
Compliance Cond. Code	Base/20	XB, XC, XH, XR	XA – XE, XH, XR
ECOA Code	Base/37 J1/J2/10	ECOA Code 3 is not applicable.	ECOA Code 3 is not applicable.
K4 Segment (deferment or forbearance)	K4/2 K4/3	Specialized Payment Indicator = 02 Deferred Payment Start Date = date the first payment is due. If not available, date on which the deferred/forbearance period will end.	Specialized Payment Indicator = 02 Deferred Payment Start Date = date the first payment is due. If not available, date on which the deferred/forbearance period will end.

Utility Companies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Utility Companies' accounts.

Field	Segment/ Field #		
Portfolio Type	Base/8	I (Installment)	O (Open)
Account Type	Base/9	06	92, 4D
Highest Credit/Original Loan Amount	Base/12	Original amount of the loan, excluding interest payments	Highest amount of credit utilized by the consumer
Terms Duration	Base/13	Number of months of the loan	'001' (for one payment due as scheduled)
Scheduled Monthly Payment Amount	Base/15	Regular monthly payment	Zero fill
Account Status	Base/17A	11, 13, 61 – 64, 71, 78, 80, 82 – 84, 93, 95 – 97, DA, DF	11, 13, 62, 64, 71, 78, 80, 82 – 84, 93, 97, DA, DF
Special Comment	Base/19	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BN, BP, BT, CP Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank	Closed = M Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AU, BP, CP Transferred = O, AH, AT, BA Other = S, V, AV, AW, CH Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XA – XJ, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Code 3 is not applicable.	ECOA Code 3 is not applicable.

Business Requirements

METRO 2® FORMAT

The Metro 2® Format was developed as a standard for the credit reporting industry and accomplishes the following:

- Provides one standard computer layout to be used for reporting accurate, complete and timely consumer credit information.
- Meets all requirements of the Fair Credit Reporting Act (FCRA), the Fair Credit Billing Act (FCBA), the Equal Credit Opportunity Act (ECOA) and all applicable state laws.
- Allows for reporting information at both the account and consumer levels.
- Allows for reporting the full four-digit year.

The Metro 2® Format was designed to allow reporting of the most accurate and complete information on consumers' credit history. It is imperative that all accounts are reported a minimum of once per month and that they are reported with a final Account Status Code when they are ultimately paid or closed.

For data furnishers or processors who report data by cycles, all accounts should be reported at the close of each cycle.

The FCRA places significant responsibility on **both** the data furnishers and Consumer Reporting Agencies. For more details, refer to the FCRA (sections 621 and 623), which can be found at www.cdiaonline.org.

The following fields within the Metro 2® Format will assist you in complying with federal and state legislation:

- Compliance Condition Code
- Date of First Delinquency
- Account Type
- Consumer Information Indicator
- ECOA Code
- Associated borrower information (J1/J2 Segments)
- Original Creditor Name and Creditor Classification (K1 Segment)

Work closely with your compliance officers and programmers to ensure that these and all fields are reported accurately and are logical in relationship to each other.

Business Requirements

RETURN ON INVESTMENT

The correct use of the Metro 2® Format helps to ensure:

- Better credit granting decisions
- Reduced manual corrections
- Compliance with legislative requirements
- Reduced need for new legislation
- Reduced legal expenses
- Reduced consumer inquiries
- Reduced consumer disputes

METRO 2® TRAINING

Training on the Metro 2® Format is available through the CDIA in three convenient formats: in-person workshops, a self-directed e-Learning course, and topic-based webinars. The CDIA's Metro 2® training programs are the only training options developed by the Metro 2® Format Task Force, comprised of members from Equifax, Experian, Innovis, and TransUnion. Registration for any of these training programs is available through the CDIA's website at www.cdiaonline.org.

- **Metro 2® Workshops:** These two-day workshops provide in-depth training on the standard reporting of consumer credit information to the consumer reporting agencies and focus on the regular automated reporting of new accounts and updates to previously-reported accounts in Metro 2®.
- **Metro 2® e-Learning Course:** This comprehensive e-Learning resource offers detailed guidance on the use of Metro 2® for both veterans and those new to the format. Access is available for a full year and includes interactive guidance on reporting as well as examples of real-world reporting scenarios. Flexible pricing options are available to allow data furnishers to provide training for individuals or large groups of employees.
- **Metro 2® Webinars:** These webinars are conducted by the Metro 2® Format Task Force to provide guidance on specific topics and are available for download after the event date. The webinars are updated periodically and as such may not be available at all times.

For additional information, please contact CDIA Education Services at (202) 408-7408 or by email at cdia_training@cdiaonline.org.

Programming Standards

CHARACTER VS. PACKED FORMAT

The Consumer Data Record consists of the Base Segment and additional segments that may be appended, as appropriate. The Header Record, Base Segment and Trailer Record are available in both unpacked and packed formats. All appendages are unpacked.

Each submission of data should contain only one occurrence of each account number.

Two formats are available: character and packed. The only differences between these two formats are some of the field positions, caused by differences in recording techniques.

Character Format (preferred)

Record Size	426 alphanumeric characters (or bytes)
Format	Fixed or variable blocked

Packed Format

Record Size	366 bytes, packed and unpacked data
Format	Variable blocked

Record Layout

426 or 366 Base Segment followed by Appendages in alphabetic sequence. For example:
Base + J1 + J2 + L1

Electronic Transmission

File Name	No spaces or special characters can be included in the File Name.
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Notes:

The Character Format is preferred for data that is submitted through electronic transmission.

Refer to Exhibit 16 for Examples of Record Layouts – Hexadecimal Representation.

Programming Standards

Reporting Standards

- Every alphanumeric field is left-justified and blank filled.
- Every alpha field should be upper case letters.
- Every numeric field is right-justified and zero filled.
- If a descriptive field is not available, it should be blank filled.
- If a numeric field is not available, it should be zero filled.
- Monetary fields are reported in whole dollars only. Cents should be truncated.
- If a monetary field is not applicable, it should be zero filled. Do not 9-fill these fields. A monetary field should be 9-filled when the amount is in excess of \$1 billion.
- If fixed-length records are being reported and a record does not require the information for the appendage segment, the Segment Identifier (e.g., J1) must be reported and the remainder of the segment must be blank filled.

Any deviation from these standards jeopardizes the integrity of the data.

Note: Contact each consumer reporting agency **prior** to reporting for information on:

- electronic transmission (**preferred**)
- acceptable media
- data encryption
- account number scrambling
- pre-production testing

Production Tips

The following tips will ensure accurate processing of your data with the consumer reporting agencies' systems:

- Use the assigned Program Identifiers in the Header Record to ensure your information is identified correctly by the consumer reporting agencies.
- Always retain a back-up copy of the data you provide. This copy could be used to replace a transmission that was unreadable.
- Use address/zip code/social security number editing logic in your New Accounts and Customer Service systems to detect keying errors. The accuracy of consumer identification information is critical.
- Do not report derogatory accounts beyond the allowable retention periods specified by federal and state laws.
- Report data at the close of the cycles if you bill by cycles.
- Do not report business accounts when companies are solely responsible for payments. Business accounts should be reported only when there are also consumers who are personally liable for payments.

Contact your consumer reporting agencies' representatives prior to:

- changing formats
- changing transmission method
- implementing internal system changes that may affect the reporting of the data
- reporting account or portfolio acquisitions
- reporting account number changes
- changing data processing centers
- changing the frequency of reporting (i.e., accounts reported more than once per month)

Refer to Exhibit 15 – Data Conversion Checklist for a useful guide to use in the conversion process.

Record Layouts

Record/Segment	Description
Header Record	Identifies the reporter and reporting period.
Base Segment	Contains account information, which applies to all consumers associated to the account. Also contains information specific to the primary consumer. For joint accounts where two or more consumers are contractually responsible, the consumer reported in the Base Segment will be considered primary for reporting purposes.
J1 Segment Associated Consumer – Same Address	Contains information specific to an associated consumer who lives at the same address as the consumer reported in the Base Segment. All account information reported in the Base Segment will be applied to this consumer.
J2 Segment Associated Consumer – Different Address	Contains information specific to an associated consumer who lives at a different address than the consumer reported in the Base Segment. All account information reported in the Base Segment will be applied to this consumer.
K1 Segment Original Creditor Name	Contains the name of the original credit grantor, including any partnering affinity name, and the creditor's classification. Reported by collection agencies, debt buyers, check guarantee companies, student loan guaranty agencies, the U.S. Department of Education and the U.S. Treasury.
K2 Segment Purchased From/Sold To	Contains the name of the company from which an account was purchased or the name of the company to which an account was sold.
K3 Segment Mortgage Information	Contains the Fannie Mae or Freddie Mac loan number associated to a mortgage account and/or the Mortgage Identification Number assigned by MERS.
K4 Segment Specialized Payment Information	Contains additional account information on deferred payments or balloon payments.
L1 Segment Account Number / Identification Number Change	Used to report a new Account Number and/or new Identification Number.
N1 Segment Employment	Contains employment information for the primary consumer reported in the Base Segment.
Trailer Record	Contains various totals of information reported on the file.

Note: Refer to Field Definitions for detailed reporting guidelines.

Record Layouts

Header Record — Character Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
0	Block Descriptor Word (BDW)	A	4	1-4	N	4-1
1	Record Descriptor Word (RDW)	Y	4	1-4	N	4-1
2	Record Identifier	Y	6	5-10	AN	4-1
3	Cycle Identifier	A	2	11-12	AN	4-2
4	Innovis Program Identifier	A	10	13-22	AN	4-2
5	Equifax Program Identifier	A	10	23-32	AN	4-2
6	Experian Program Identifier	A	5	33-37	AN	4-2
7	TransUnion Program Identifier	A	10	38-47	AN	4-2
8	Activity Date	Y	8	48-55	N	4-2
9	Date Created	Y	8	56-63	N	4-2
10	Program Date		8	64-71	N	4-2
11	Program Revision Date		8	72-79	N	4-3
12	Reporter Name	Y	40	80-119	AN	4-3
13	Reporter Address	Y	96	120-215	AN	4-3
14	Reporter Telephone Number		10	216-225	N	4-3
15	Software Vendor Name	A	40	226-265	AN	4-3
16	Software Version Number	A	5	266-270	AN	4-3
17	MicroBilt/PRBC Program Identifier	A	10	271-280	AN	4-3
18	Reserved		146	281-426	AN	4-3

Total
426

¹ Required Fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

426 Base Segment — Character Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
0	Block Descriptor Word (BDW)	A	4	1-4	N	4-4
1	Record Descriptor Word (RDW)	Y	4	1-4	N	4-4
2	Processing Indicator		1	5	N	4-4
3	Time Stamp		14	6-19	N	4-5
4	Reserved		1	20	N	4-5
5	Identification Number	Y	20	21-40	AN	4-5
6	Cycle Identifier	A	2	41-42	AN	4-5
7	Consumer Account Number	Y	30	43-72	AN	4-5
8	Portfolio Type	Y	1	73	AN	4-6
9	Account Type	Y	2	74-75	AN	4-6
10	Date Opened	Y	8	76-83	N	4-6
11	Credit Limit	A	9	84-92	N	4-7
12	Highest Credit or Original Loan Amount	Y	9	93-101	N	4-7
13	Terms Duration	Y	3	102-104	AN	4-8
14	Terms Frequency	A	1	105	AN	4-8
15	Scheduled Monthly Payment Amount	A	9	106-114	N	4-9
16	Actual Payment Amount	A	9	115-123	N	4-9
17A	Account Status	Y	2	124-125	AN	4-10
17B	Payment Rating	A	1	126	AN	4-10
18	Payment History Profile	Y	24	127-150	AN	4-11
19	Special Comment	A	2	151-152	AN	4-12
20	Compliance Condition Code	A	2	153-154	AN	4-13
21	Current Balance	Y	9	155-163	N	4-14
22	Amount Past Due	A	9	164-172	N	4-14
23	Original Charge-off Amount	A	9	173-181	N	4-14

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

426 Base Segment — Character Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
24	Date of Account Information	Y	8	182-189	N	4-15
25	FCRA Compliance/ Date of First Delinquency	A	8	190-197	N	4-16
26	Date Closed	A	8	198-205	N	4-17
27	Date of Last Payment	A	8	206-213	N	4-17
28	Interest Type Indicator		1	214	AN	4-17
29	Reserved		17	215-231	AN	4-17
30	Surname	Y	25	232-256	AN	4-18
31	First Name	Y	20	257-276	AN	4-18
32	Middle Name	A	20	277-296	AN	4-19
33	Generation Code	A	1	297	AN	4-19
34	Social Security Number	Y	9	298-306	N	4-19
35	Date of Birth	Y	8	307-314	N	4-20
36	Telephone Number		10	315-324	N	4-20
37	ECOA Code	Y	1	325	AN	4-20
38	Consumer Information Indicator	A	2	326-327	AN	4-21
39	Country Code		2	328-329	AN	4-21
40	First Line of Address	Y	32	330-361	AN	4-22
41	Second Line of Address	A	32	362-393	AN	4-22
42	City	Y	20	394-413	AN	4-22
43	State	Y	2	414-415	AN	4-23
44	Postal/Zip Code	Y	9	416-424	AN	4-23
45	Address Indicator		1	425	AN	4-23
46	Residence Code		1	426	AN	4-23

Total
426

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

J1 Segment Associated Consumer — Same Address

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-24
2	Reserved		1	3	AN	4-24
3	Surname	Y	25	4-28	AN	4-24
4	First Name	Y	20	29-48	AN	4-25
5	Middle Name	A	20	49-68	AN	4-25
6	Generation Code	A	1	69	AN	4-25
7	Social Security Number	Y	9	70-78	N	4-26
8	Date of Birth	Y	8	79-86	N	4-26
9	Telephone Number		10	87-96	N	4-27
10	ECOA Code	Y	1	97	AN	4-27
11	Consumer Information Indicator	A	2	98-99	AN	4-28
12	Reserved		1	100	AN	4-28

Total
100

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

J2 Segment Associated Consumer — Different Address

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-29
2	Reserved		1	3	AN	4-29
3	Surname	Y	25	4-28	AN	4-29
4	First Name	Y	20	29-48	AN	4-30
5	Middle Name	A	20	49-68	AN	4-30
6	Generation Code	A	1	69	AN	4-30
7	Social Security Number	Y	9	70-78	N	4-31
8	Date of Birth	Y	8	79-86	N	4-32
9	Telephone Number		10	87-96	N	4-33
10	ECOA Code	Y	1	97	AN	4-33
11	Consumer Information Indicator	A	2	98-99	AN	4-34
12	Country Code		2	100-101	AN	4-34
13	First Line of Address	Y	32	102-133	AN	4-35
14	Second Line of Address	A	32	134-165	AN	4-35
15	City	Y	20	166-185	AN	4-35
16	State	Y	2	186-187	AN	4-36
17	Postal/Zip Code	Y	9	188-196	AN	4-36
18	Address Indicator		1	197	AN	4-36
19	Residence Code		1	198	AN	4-36
20	Reserved		2	199-200	AN	4-36

Total
200

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

K1 Segment Original Creditor Name

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-37
2	Original Creditor Name	Y	30	3-32	AN	4-38
3	Creditor Classification	Y	2	33-34	N	4-39

Total
34

K2 Segment Purchased From/Sold To

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-40
2	Purchased From/Sold To Indicator	Y	1	3	N	4-40
3	Purchased From or Sold To Name	Y	30	4-33	AN	4-40
4	Reserved		1	34	AN	4-40

Total
34

¹ Required fields: Y = Yes, Field is always required.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

K3 Segment Mortgage Information

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-41
2	Agency Identifier	A	2	3-4	N	4-41
3	Account Number	A	18	5-22	AN	4-41
4	Mortgage Identification Number		18	23-40	AN	4-41

Total 40

K4 Segment Specialized Payment Information

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-42
2	Specialized Payment Indicator	Y	2	3-4	N	4-42
3	Deferred Payment Start Date	A	8	5-12	N	4-42
4	Balloon Payment Due Date	A	8	13-20	N	4-42
5	Balloon Payment Amount	A	9	21-29	N	4-42
6	Reserved		1	30	AN	4-42

Total 30

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

L1 Segment

Account Number/Identification Number Change

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-43
2	Change Indicator	Y	1	3	N	4-43
3	New Consumer Account Number	A	30	4-33	AN	4-43
4	New Identification Number	A	20	34-53	AN	4-44
5	Reserved		1	54	AN	4-44

Total
54

N1 Segment

Employment

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-45
2	Employer Name	Y	30	3-32	AN	4-45
3	First Line of Employer Address		32	33-64	AN	4-45
4	Second Line of Employer Address		32	65-96	AN	4-45
5	Employer City		20	97-116	AN	4-45
6	Employer State		2	117-118	AN	4-45
7	Employer Postal/Zip Code		9	119-127	AN	4-45
8	Occupation	A	18	128-145	AN	4-46
9	Reserved		1	146	AN	4-46

Total
146

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

Trailer Record — Character Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Record Descriptor Word (RDW)	Y	4	1-4	N	4-47
2	Record Identifier	Y	7	5-11	AN	4-47
3	Total Base Records	Y	9	12-20	N	4-47
4	Reserved		9	21-29	AN	4-47
5	Total of Status Code DF		9	30-38	N	4-47
6	Total Associated Consumer Segments (J1)	A	9	39-47	N	4-47
7	Total Associated Consumer Segments (J2)	A	9	48-56	N	4-47
8	Block Count	Y	9	57-65	N	4-47
9	Total of Status Code DA		9	66-74	N	4-47
10	Total of Status Code 05		9	75-83	N	4-47
11	Total of Status Code 11		9	84-92	N	4-47
12	Total of Status Code 13		9	93-101	N	4-48
13	Total of Status Code 61		9	102-110	N	4-48
14	Total of Status Code 62		9	111-119	N	4-48
15	Total of Status Code 63		9	120-128	N	4-48
16	Total of Status Code 64		9	129-137	N	4-48
17	Total of Status Code 65		9	138-146	N	4-48
18	Total of Status Code 71		9	147-155	N	4-48
19	Total of Status Code 78		9	156-164	N	4-48
20	Total of Status Code 80		9	165-173	N	4-48
21	Total of Status Code 82		9	174-182	N	4-48
22	Total of Status Code 83		9	183-191	N	4-48
23	Total of Status Code 84		9	192-200	N	4-48
24	Total of Status Code 88		9	201-209	N	4-48
25	Total of Status Code 89		9	210-218	N	4-49
26	Total of Status Code 93		9	219-227	N	4-49
27	Total of Status Code 94		9	228-236	N	4-49
28	Total of Status Code 95		9	237-245	N	4-49

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

Trailer Record — Character Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
29	Total of Status Code 96		9	246-254	N	4-49
30	Total of Status Code 97		9	255-263	N	4-49
31	Total of ECOA Code Z (All Segments)		9	264-272	N	4-49
32	Total Employment Segments		9	273-281	N	4-49
33	Total Original Creditor Segments		9	282-290	N	4-49
34	Total Purchased From/Sold To Segments		9	291-299	N	4-49
35	Total Mortgage Information Segments		9	300-308	N	4-49
36	Total Specialized Payment Information Segments		9	309-317	N	4-49
37	Total Change Segments		9	318-326	N	4-49
38	Total Social Security Numbers (All Segments)		9	327-335	N	4-50
39	Total Social Security Numbers (Base Segments)		9	336-344	N	4-50
40	Total Social Security Numbers (J1 Segments)		9	345-353	N	4-50
41	Total Social Security Numbers (J2 Segments)		9	354-362	N	4-50
42	Total Dates of Birth (All Segments)		9	363-371	N	4-50
43	Total Dates of Birth (Base Segments)		9	372-380	N	4-50
44	Total Dates of Birth (J1 Segments)		9	381-389	N	4-50
45	Total Dates of Birth (J2 Segments)		9	390-398	N	4-50
46	Total Telephone Numbers (All Segments)		9	399-407	N	4-50
47	Reserved		19	408-426	AN	4-50

Total
426

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

Header Record — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
0	Block Descriptor Word (BDW)	Y	4	1-4	B	4-1
1	Record Descriptor Word (RDW)	Y	4	1-4	B	4-1
2	Record Identifier	Y	6	5-10	AN	4-1
3	Cycle Identifier	A	2	11-12	AN	4-2
4	Innovis Program Identifier	A	10	13-22	AN	4-2
5	Equifax Program Identifier	A	10	23-32	AN	4-2
6	Experian Program Identifier	A	5	33-37	AN	4-2
7	TransUnion Program Identifier	A	10	38-47	AN	4-2
8	Activity Date	Y	8	48-55	N	4-2
9	Date Created	Y	8	56-63	N	4-2
10	Program Date		8	64-71	N	4-2
11	Program Revision Date		8	72-79	N	4-3
12	Reporter Name	Y	40	80-119	AN	4-3
13	Reporter Address	Y	96	120-215	AN	4-3
14	Reporter Telephone Number		10	216-225	N	4-3
15	Software Vendor Name	A	40	226-265	AN	4-3
16	Software Version Number	A	5	266-270	AN	4-3
17	MicroBilt/PRBC Program Identifier	A	10	271-280	AN	4-3
18	Reserved		86	281-366	AN	4-3

Total
366

¹ Required Fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

² Recording Technique: AN = Alphanumeric; B = Binary; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

366 Base Segment — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
0	Block Descriptor Word (BDW)	Y	4	1-4	B	4-4
1	Record Descriptor Word (RDW)	Y	4	1-4	B	4-4
2	Processing Indicator		1	5	N	4-4
3	Time Stamp		8	6-13	P	4-5
4	Reserved		1	14	N	4-5
5	Identification Number	Y	20	15-34	AN	4-5
6	Cycle Identifier	A	2	35-36	AN	4-5
7	Consumer Account Number	Y	30	37-66	AN	4-5
8	Portfolio Type	Y	1	67	AN	4-6
9	Account Type	Y	2	68-69	AN	4-6
10	Date Opened	Y	5	70-74	P	4-6
11	Credit Limit	A	5	75-79	P	4-7
12	Highest Credit or Original Loan Amount	Y	5	80-84	P	4-7
13	Terms Duration	Y	3	85-87	AN	4-8
14	Terms Frequency	A	1	88	AN	4-8
15	Scheduled Monthly Payment Amount	A	5	89-93	P	4-9
16	Actual Payment Amount	A	5	94-98	P	4-9
17A	Account Status	Y	2	99-100	AN	4-10
17B	Payment Rating	A	1	101	AN	4-10
18	Payment History Profile	Y	24	102-125	AN	4-11
19	Special Comment	A	2	126-127	AN	4-12
20	Compliance Condition Code	A	2	128-129	AN	4-13
21	Current Balance	Y	5	130-134	P	4-14
22	Amount Past Due	A	5	135-139	P	4-14

¹ Required Fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

² Recording Technique: AN = Alphanumeric; B = Binary; N = Numeric; P = Packed

³ Refer to definitions for field descriptions.

Record Layouts

366 Base Segment — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
23	Original Charge-off Amount	A	5	140-144	P	4-14
24	Date of Account Information	Y	5	145-149	P	4-15
25	FCRA Compliance/Date of First Delinquency	A	5	150-154	P	4-16
26	Date Closed	A	5	155-159	P	4-17
27	Date of Last Payment	A	5	160-164	P	4-17
28	Interest Type Indicator		1	165	AN	4-17
29	Reserved		17	166-182	AN	4-17
30	Surname	Y	25	183-207	AN	4-18
31	First Name	Y	20	208-227	AN	4-18
32	Middle Name	A	20	228-247	AN	4-19
33	Generation Code	A	1	248	AN	4-19
34	Social Security Number	Y	5	249-253	P	4-19
35	Date of Birth	Y	5	254-258	P	4-20
36	Telephone Number		6	259-264	P	4-20
37	ECOA Code	Y	1	265	AN	4-20
38	Consumer Information Indicator	A	2	266-267	AN	4-21
39	Country Code		2	268-269	AN	4-21
40	First Line of Address	Y	32	270-301	AN	4-22
41	Second Line of Address	A	32	302-333	AN	4-22
42	City	Y	20	334-353	AN	4-22
43	State	Y	2	354-355	AN	4-23
44	Postal/Zip Code	Y	9	356-364	AN	4-23
45	Address Indicator		1	365	AN	4-23
46	Residence Code		1	366	AN	4-23

Total
366

¹ Required Fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

² Recording Technique: AN = Alphanumeric; P = Packed

³ Refer to definitions for field descriptions.

Record Layouts

Trailer Record — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Record Descriptor Word (RDW)	Y	4	1-4	B	4-47
2	Record Identifier	Y	7	5-11	AN	4-47
3	Total Base Records	Y	5	12-16	P	4-47
4	Reserved		5	17-21	AN	4-47
5	Total of Status Code DF		5	22-26	P	4-47
6	Total Associated Consumer Segments (J1)	A	5	27-31	P	4-47
7	Total Associated Consumer Segments (J2)	A	5	32-36	P	4-47
8	Block Count	Y	5	37-41	P	4-47
9	Total of Status Code DA		5	42-46	P	4-47
10	Total of Status Code 05		5	47-51	P	4-47
11	Total of Status Code 11		5	52-56	P	4-47
12	Total of Status Code 13		5	57-61	P	4-48
13	Total of Status Code 61		5	62-66	P	4-48
14	Total of Status Code 62		5	67-71	P	4-48
15	Total of Status Code 63		5	72-76	P	4-48
16	Total of Status Code 64		5	77-81	P	4-48
17	Total of Status Code 65		5	82-86	P	4-48
18	Total of Status Code 71		5	87-91	P	4-48
19	Total of Status Code 78		5	92-96	P	4-48
20	Total of Status Code 80		5	97-101	P	4-48
21	Total of Status Code 82		5	102-106	P	4-48
22	Total of Status Code 83		5	107-111	P	4-48
23	Total of Status Code 84		5	112-116	P	4-48
24	Total of Status Code 88		5	117-121	P	4-48
25	Total of Status Code 89		5	122-126	P	4-49
26	Total of Status Code 93		5	127-131	P	4-49
27	Total of Status Code 94		5	132-136	P	4-49

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

² Recording Technique: AN = Alphanumeric; B = Binary; P = Packed

³ Refer to definitions for field descriptions.

Record Layouts

Trailer Record — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
28	Total of Status Code 95		5	137-141	P	4-49
29	Total of Status Code 96		5	142-146	P	4-49
30	Total of Status Code 97		5	147-151	P	4-49
31	Total of ECOA Code Z (All Segments)		5	152-156	P	4-49
32	Total Employment Segments		5	157-161	P	4-49
33	Total Original Creditor Segments		5	162-166	P	4-49
34	Total Purchased From/Sold To Segments		5	167-171	P	4-49
35	Total Mortgage Information Segments		5	172-176	P	4-49
36	Total Specialized Payment Information Segments		5	177-181	P	4-49
37	Total Change Segments		5	182-186	P	4-49
38	Total Social Security Numbers (All Segments)		5	187-191	P	4-50
39	Total Social Security Numbers (Base Segments)		5	192-196	P	4-50
40	Total Social Security Numbers (J1 Segments)		5	197-201	P	4-50
41	Total Social Security Numbers (J2 Segments)		5	202-206	P	4-50
42	Total Dates of Birth (All Segments)		5	207-211	P	4-50
43	Total Dates of Birth (Base Segments)		5	212-216	P	4-50
44	Total Dates of Birth (J1 Segments)		5	217-221	P	4-50
45	Total Dates of Birth (J2 Segments)		5	222-226	P	4-50
46	Total Telephone Numbers (All Segments)		5	227-231	P	4-50
47	Reserved		135	232-366	AN	4-50

Total
366

¹ Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

² Recording Technique: AN = Alphanumeric; P = Packed

³ Refer to definitions for field descriptions.

Field Definitions

Header Record

The Header Record must be the first record provided and includes information necessary to identify the reporter.

FIELD	FIELD NAME & DESCRIPTION	426 Character Format ¹		
		Length	Position	Recording Technique
0	Block Descriptor Word (BDW) Contains a value equal to the length of the block of data and must be reported when using the packed format or when reporting variable length records. This value includes the four bytes reserved for this field. Report the standard IBM variable record length conventions. *This field is not required when reporting fixed length, fixed block records.	4	1-4 of each block of data*	N
1	Record Descriptor Word (RDW) Contains a value equal to the length of the physical record. This value includes the four bytes reserved for this field. The recording technique is Numeric for the 426 format and Binary for the 366 format. <ul style="list-style-type: none">Numeric: The entire four bytes are used. Example: F0F4F2F6.Binary: The hexadecimal value should be in the first two bytes of the field and the last two bytes should contain binary zeros. Example: 016E0000. If fixed-length records are being reported, the Header Record should be the same length as all the data records. The Header Record should be padded with blanks to fill the needed number of positions.	4	1-4 of each physical record	N
2	Record Identifier Contains a constant of HEADER , which is used to identify this record.	6	5-10	AN

¹ For 366 Packed Format specifications, refer to the Record Layouts section of the Metro 2[®] Format module.

Field Definitions

Header Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
3	Cycle Identifier Contains the cycle identifier for the information being reported, if reporting by cycles. If data contains more than one cycle, report the first cycle identifier found on the data.	2	11-12	AN
4	Innovis Program Identifier Contains a unique identification number assigned by this consumer reporting agency.	10	13-22	AN
5	Equifax Program Identifier Contains a unique identification number assigned by this consumer reporting agency.	10	23-32	AN
6	Experian Program Identifier Contains a unique identification number assigned by this consumer reporting agency.	5	33-37	AN
7	TransUnion Program Identifier Contains a unique identification number assigned by this consumer reporting agency.	10	38-47	AN
8	Activity Date Signifies date of most recent update to accounts. If accounts are updated on different dates, use most recent. A future date should not be reported. Format is MMDDYYYY.	8	48-55	N
9	Date Created Contains the date the media was generated. A future date should not be reported. Format is MMDDYYYY.	8	56-63	N
10	Program Date Contains the date your reporting format was developed. Format is MMDDYYYY. If the day is not available, use 01.	8	64-71	N

Field Definitions

Header Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
11	Program Revision Date Contains the last date your reporting format was revised. Format is MMDDYYYY. If the day is not available, use 01.	8	72-79	N
12	Reporter Name Contains the name of the processing company sending the data; i.e., data furnisher or processor. If multiple Header Records are provided, the Reporter Name on the second and subsequent Headers may be repeated or blank filled.	40	80-119	AN
13	Reporter Address Contains the complete mailing address of the processing company; i.e., street address, city, state and zip code.	96	120-215	AN
14	Reporter Telephone Number Contains the telephone number (Area Code + number) of the company sending the data; i.e., data furnisher or processor.	10	216-225	N
15	Software Vendor Name Contains the name of the software vendor that provided the Metro 2® Format software.	40	226-265	AN
16	Software Version Number Contains the version number of the Metro 2® Format software.	5	266-270	AN
17	MicroBilt/PRBC Program Identifier Contains a unique identification number assigned by this consumer reporting agency.	10	271-280	AN
18	Reserved Blank fill.	146	281-426	AN

Field Definitions

Base Segment

This section describes each data element in the Base Segment, which is used to report the primary consumer's identification information and the account transactional information.

FIELD	FIELD NAME & DESCRIPTION	426 Character Format ¹		
		Length	Position	Recording Technique
0	Block Descriptor Word (BDW) Contains a value equal to the length of the block of data and must be reported when using the packed format or when reporting variable length records. This value includes the four bytes reserved for this field. Report the standard IBM variable record length conventions. *This field is not required when reporting fixed length, fixed block records.	4	1-4 of each block of data*	N
1	Record Descriptor Word (RDW) Contains a value equal to the length of the physical record. This value includes the four bytes reserved for this field. The length of each segment should be included in the RDW. For example: Base Segment= 426 J2 Segment = 200 K1 Segment = 34 RDW = 0660 For fixed block, the RDW will remain the same for each record. For variable block, the RDW will change depending on the size of each record.	4	1-4 of each physical record	N
2	Processing Indicator Report a constant of 1 .	1	5	N

¹ For 366 Packed Format specifications, refer to the Record Layouts section of the Metro 2[®] Format module.

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
3	Time Stamp Contains date and time of actual account information update. Format for packed date is 0MMDDYYYYHHMMSSs — where s is the sign. Format is MMDDYYYYHHMMSS for character date.	14	6-19	N
4	Reserved Zero fill. Field formerly used for Correction Indicator.	1	20	N
5	Identification Number Used to uniquely identify a data furnisher. Report your internal code to identify each branch, office, and/or credit central where information is verified. For accounts reported by servicers, the Identification Number should refer to the current holder of the note. This number must be unique, at least 5 digits long, and should not include embedded blanks or special characters. Entire field should <i>never</i> be zero, blank or 9 filled. This field must be consistent on a month-to-month basis to avoid duplication of information. Notify consumer reporting agencies before adding, deleting, or changing the identifiers in this field.	20	21-40	AN
6	Cycle Identifier Report the internal cycle code for this account. Field is required if reporting by cycles; otherwise blank fill.	2	41-42	AN
7	Consumer Account Number Report the individual's complete and unique account number as extracted from your file. Do not include embedded blanks or special characters. Do not report the Social Security Number, in whole or in part, within the Consumer Account Number. Account number scrambling and encryption methods for security purposes are permitted. Contact the consumer reporting agencies for information regarding the Metro 2® scrambling techniques.	30	43-72	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
8	Portfolio Type Contains the one-character abbreviation for type of portfolio. Values available: C = Line of Credit I = Installment M = Mortgage O = Open R = Revolving Refer to the Glossary of Terms for definitions of each Portfolio Type.	1	73	AN
9	Account Type Report the specific code that identifies the account classification. Exhibit 1 provides a numeric listing of type codes that specify industry usage, and Exhibit 2 provides an alphabetic listing of type codes within their corresponding Portfolio Types.	2	74-75	AN
10	Date Opened Report the date the account was originally opened. Retain the original Date Opened regardless of future activity, such as transfer, refinance, lost or stolen card, etc. Valid Dates Opened must be reported – field cannot be zero or blank filled, nor contain a date in the future. For companies who report returned checks, such as collection agencies, report the date of the check. Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. If the day is not available, use 01.	8	76-83	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
11	Credit Limit Report the following values in whole dollars only: Line of Credit = Assigned credit limit* Installment = Zero fill Mortgage = Zero fill Open = Assigned credit limit*, if applicable; otherwise, zero fill Revolving = Assigned credit limit* * For closed accounts, continue to report the last assigned credit limit.	9	84-92	N
12	Highest Credit or Original Loan Amount Report the following values in whole dollars only: Line of Credit = Highest amount of credit utilized by the consumer Installment = Original amount of the loan excluding interest payments Mortgage = Original amount of the loan excluding interest payments Open = Highest amount of credit utilized by the consumer, if applicable Revolving = Highest amount of credit utilized by the consumer For companies who report returned checks, such as collection agencies, report the original amount of the check, excluding fees and interest.	9	93-101	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
13	Terms Duration Contains the duration of credit extended. Line of Credit = Constant of LOC Installment = Number of months Mortgage = Number of years Open = Constant of 001 <i>One payment as scheduled</i> Revolving = Constant of REV Exhibit 3 provides the calculations necessary to convert Terms Duration to monthly.	3	102-104	AN
14	Terms Frequency Report the frequency for payments due. Values available: D = Deferred (Refer to Note) P = Single Payment Loan W = Weekly B = Biweekly E = Semimonthly M = Monthly L = Bimonthly Q = Quarterly T = Tri-annually S = Semiannually Y = Annually Exhibit 3 provides definitions of the Terms Frequency Codes. Note: When reporting Deferred loans, report the Deferred Payment Start Date in the K4 Segment.	1	105	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
15	<p>Scheduled Monthly Payment Amount</p> <p>Report the dollar amount of the scheduled monthly payment due for this reporting period, whether principal, interest only or a combination of the two. When a balloon payment is also due during the reporting period, the balloon payment amount should be included to represent the entire monthly payment amount due.</p> <p>Report in whole dollars only. When the account is paid in full, the Scheduled Monthly Payment Amount should be zero filled.</p> <p>Line of Credit = Minimum amount due based on balance, not including any amounts past due</p> <p>Installment = Regular monthly payment</p> <p>Mortgage = Regular monthly payment, including the principal, interest, and escrow due this month</p> <p>Open = Zero fill</p> <p>Revolving = Minimum amount due based on balance, not including any amounts past due</p> <p>Exhibit 3 provides the calculations necessary to convert payment amounts to monthly.</p>	9	106-114	N
16	<p>Actual Payment Amount</p> <p>Report the dollar amount of the monthly payment actually received for this reporting period in whole dollars only.</p> <p>If multiple payments are made during the reporting period, the total amount should be reported.</p>	9	115-123	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
17A	<p>Account Status</p> <p>Contains the status code that properly identifies the current condition of the account as of the Date of Account Information (Field 24).</p> <p>Exhibit 4 provides a description of these codes.</p> <p>The Payment Rating (Field 17B) must also be reported when the Account Status Code is 05, 13, 65, 88, 89, 94, or 95.</p> <p>Special Comments (Field 19) may be used in conjunction with the Account Status to further define the account.</p> <p>For examples of how Account Statuses, Payment Ratings and Special Comments interact, refer to Frequently Asked Question 12.</p>	2	124-125	AN
17B	<p>Payment Rating</p> <p>When the Account Status (Field 17A) contains 05, 13, 65, 88, 89, 94 or 95, this field must also be reported. The Payment Rating must be blank filled for all other Account Status Codes.</p> <p>The Payment Rating contains a code that properly identifies whether the account was current, past due, in collections or charged off prior to the status and within the current month's reporting period.</p> <p>Values available:</p> <p>0 = Current account (0-29 days past the due date) 1 = 30-59 days past the due date 2 = 60-89 days past the due date 3 = 90-119 days past the due date 4 = 120-149 days past the due date 5 = 150-179 days past the due date 6 = 180 or more days past the due date G = Collection L = Charge-off</p> <p>For example, if the account was paid on March 22, 2020, but the consumer was 30 days past the due date on March 10, 2020 prior to paying the account, report Account Status Code = 13 and Payment Rating = 1.</p>	1	126	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
18	<p>Payment History Profile</p> <p>Contains up to 24 months of consecutive payment activity for the previous 24 reporting periods prior to the Date of Account Information (Field 24) being reported. Report one month's payment history in each byte from the left to right in most recent to least recent order. The first byte should represent the Account Status Code reported in the previous reporting period. Refer to Exhibit 5 for examples of reporting payment history, which includes examples for month-end reporters, as well as examples for reporters who submit data on other days of the month (e.g., 1st, 15th, etc.). Values available:</p> <p>0 = 0 payments past due (current account) 1 = 30 - 59 days past due date 2 = 60 - 89 days past due date 3 = 90 - 119 days past due date 4 = 120 - 149 days past due date 5 = 150 - 179 days past due date 6 = 180 or more days past due date B = No payment history available prior to this time – either because the account was not open or because the payment history cannot be furnished. A "B" may not be embedded within other values. D = No payment history reported/available this month. "D" may be embedded in the payment history profile. E = Zero balance and current account (Applies to Credit Cards and Lines of Credit) G = Collection H = Foreclosure Completed J = Voluntary Surrender K = Repossession L = Charge-off</p> <p>No other values are acceptable in this field.</p> <p>If a full 24 months of history are not available for reporting, the ending positions of this field should be B-filled.</p> <p>The Payment History Profile is intended to be used to report monthly history, regardless of the Terms Frequency.</p> <p>Reporting of the Payment History Profile provides a method for automated correction of erroneously reported history.</p> <p>For important information:</p> <ul style="list-style-type: none"> • Paid accounts - refer to Frequently Asked Question 41. • First-time reporters - refer to Frequently Asked Question 22. 	24	127-150	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
19	<p>Special Comment</p> <p>Used in conjunction with Account Status (Field 17A) and Payment Rating (Field 17B) to further define the account (e.g., closed accounts or adjustments pending). The Special Comment Code must be reported each month as long as the condition applies.</p> <p>If more than one Special Comment applies to an account, it is the data furnisher's decision to report the comment that is deemed most important from a business perspective for the current reporting period.</p> <p>If no Special Comment is applicable, blank fill.</p> <p>Exhibit 6 provides a list of available comments by category within Portfolio Type and Exhibit 7 provides a list of codes in alphabetical sequence. Both exhibits include definitions and usage guidelines.</p> <p>For examples of how Account Statuses, Payment Ratings and Special Comments interact, refer to Frequently Asked Question 12.</p>	2	151-152	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
20	<p>Compliance Condition Code</p> <p>Allows the reporting of a condition that is required for legal compliance.</p> <p>This condition may refer to accounts closed at consumer's request, accounts in dispute under the Fair Credit Reporting Act (FCRA), the Fair Debt Collection Practices Act (FDCPA) or the Fair Credit Billing Act (FCBA).</p> <p>The code should be reported each month as long as the condition applies. As an option, the code may be reported one time and will remain on file until another Compliance Condition Code or the XR (Removal code) is reported. Regardless of the method of reporting, the code will be deleted only when another Compliance Condition Code or the XR (Removal code) is reported.</p> <p>Exhibit 8 provides a list of Compliance Condition Codes and examples that demonstrate how to report these codes.</p> <p>For questions about the use of Compliance Condition Codes or how long to report them, data furnishers should refer to their internal policies and procedures.</p>	2	153-154	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
21	<p>Current Balance Report the outstanding current balance on the account as of the Date of Account Information.</p> <p>The Current Balance should contain the principal balance including Balloon Payment Amounts (when applicable), as well as applicable interest, late charges, fees, insurance payments and escrow that are due during the current reporting period. The Current Balance may exceed the Highest Credit, Original Loan Amount or Credit Limit.</p> <p>The Current Balance should not include <u>future</u> interest, escrow, fees or insurance payments.</p> <p>This amount, which should be reported in whole dollars only, may increase or decline from month to month. Credit balances (negative balances) should be reported as zero.</p>	9	155-163	N
22	<p>Amount Past Due Report the total amount of payments that are 30 days or more past due in whole dollars only. This field should include late charges and fees, if applicable. Do not include current amount due in this field.</p> <p>Note: If the Account Status is current (Status Code 11), this field should be zero.</p>	9	164-172	N
23	<p>Original Charge-off Amount For Status Codes 64 and 97 (all portfolio types), report the original amount charged to loss, regardless of the declining balance. Report whole dollars only.</p> <p>If payments are received from the consumer, report the outstanding balance in the Current Balance and Amount Past Due fields.</p>	9	173-181	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
24	<p>Date of Account Information</p> <p>All account information in the Base Segment, such as Account Status and Current Balance, must be reported as of the date in this field.</p> <p>For Account Status Codes 11, 71, 78, 80, 82-84, 88, 89, 93-97, DA and DF, report a date within the current month's reporting period, as noted below:</p> <ul style="list-style-type: none"> • Cycle Reporters – Report the date of the current month's billing cycle. <i>This method is preferred to facilitate accurate and timely reporting of account information.</i> • Monthly Reporters – Report the date within the current month's reporting period that represents the most recent update to the account, such as mid-month (03/15/2020) or end of month (03/31/2020). The Date of Account Information may represent the consumer's billing date as long as the date is within the <u>current month's reporting period</u>. A historic or future date should not be reported. <p>For Account Status Codes 13 and 61-65, report the date paid, unless the account was closed due to inactivity; then report the date within the current reporting period when the account was closed to further charges.</p> <p>For accounts reported with bankruptcy Consumer Information Indicators, refer to Frequently Asked Questions 27 and 28 for guidelines on reporting the Date of Account Information.</p> <p>Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs – where s is the sign.</p> <p>Notes: This date must not reflect a future date.</p> <p>For guidelines on reporting paid, closed or inactive accounts, refer to FAQs 39, 40 and 41.</p> <p>For guidelines on reporting transferred or sold accounts, refer to FAQs 46 and 47.</p>	8	182-189	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
25	FCRA Compliance/Date of First Delinquency This date is used to ensure compliance with the Fair Credit Reporting Act. The date in the Date of First Delinquency field must be determined each reporting period based on the following hierarchy: 1. For Account Status Codes 61-65, 71, 78, 80, 82-84, 88-89 and 93-97, report the date of the first 30-day delinquency that led to the status being reported. This date should be 30 days after the Due Date. If a delinquent account becomes current, the Date of First Delinquency should be zero filled. Then if the account goes delinquent again, the Date of First Delinquency starts over with the new first delinquency date. 2. For Account Status Codes 05 and 13, if the Payment Rating is 1, 2, 3, 4, 5, 6, G or L, report the date of the first 30-day delinquency that led to the Payment Rating being reported. This date should be 30 days after the Due Date. 3. For Consumer Information Indicators A-H and Z (Bankruptcies), 1A (Personal Receivership) and V-Y (Reaffirmation of Debt Rescinded with Bankruptcy Chapters), if the account is current (Account Status Code 11 or Account Status Code 05 or 13 with Payment Rating 0), report the date of the bankruptcy/personal receivership petition or notification. Even though the account is not delinquent, this date is required for purging purposes. Note: Consumer Information Indicators W, X & Y are obsolete as of September 2010 and may no longer be reported. If none of the conditions listed in the above hierarchy apply, the Date of First Delinquency should be zero filled. The Date of First Delinquency is used by the consumer reporting agencies for purging purposes. Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. Notes: <ul style="list-style-type: none"> • Refer to Exhibit 9 for detailed reporting instructions, examples and excerpts from the Fair Credit Reporting Act. • First-time reporters should refer to Frequently Asked Question 22 for important information. 	8	190-197	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
26	Date Closed For all portfolio types, contains the date the account was closed to further purchases, paid in full, transferred or sold. For Line of Credit, Open or Revolving accounts, there may be a balance due. Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. If not applicable, zero fill.	8	198-205	N
27	Date of Last Payment Report the date the most recent payment was received, whether full or partial payment is made. Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. If the day is not available, use 01.	8	206-213	N
28	Interest Type Indicator Contains one of the following values that designates the interest type: F = Fixed V = Variable/Adjustable If indicator not available or unknown, blank fill. Note: Report indicator 'V' for loans where the interest rate will be variable at some point, even if the interest rate starts as fixed.	1	214	AN
29	Reserved Blank fill. Last position of field formerly used for Consumer Transaction Type.	17	215-231	AN

Field Definitions

Base Segment

Note: Fields 30 through 46 contain identification information for the primary consumer. For joint accounts where two or more consumers are contractually responsible, the consumer reported in this Base Segment will be considered primary for reporting purposes.

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
30	<p>Surname Report the last name of the primary consumer. Titles and prefixes should not be reported.</p> <p>If the surname contains multiple names, such as Paternal Name-Maternal Name, hyphenate the surnames. For example, "SMITH-JONES" or "MARTINEZ-REYES" requires the hyphen.</p> <p>If the surname contains separate words, the hyphen is not required. For example, report "VAN DYKE" or "DE LA CRUZ" with a space between each word.</p> <p>Other than the hyphen, do not report special characters in any of the Consumer Name fields.</p> <p>The Generation Code should be reported in Field 33.</p> <p>Notes: Do not report minors. The name fields should not contain messages, such as "Parent of", "Baby", "Daughter", "Child", etc.</p> <p>Do not report trustee or estate accounts. In cases where the debt is included in a revocable trust and the consumer retains contractual responsibility, report the consumer's Full Name, Address, Social Security Number, and Date of Birth within the Base Segment fields. Do not report the name of the trust.</p>	25	232-256	AN
31	<p>First Name Report the full first name of the primary consumer. Names should not be abbreviated. Examples: Report first name "JUNIOR" (not "JR"); report "ROBERT" (not "ROBT").</p> <p>If reporting multiple first names, hyphenate the first names.</p> <p>Note: If a consumer uses only initials for first and middle names (e.g., A.J.), the first name initial should be reported in the First Name field (e.g., A) and the middle initial should be reported in the Middle Name field (e.g., J).</p>	20	257-276	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
32	Middle Name Report the middle name or middle initial of the primary consumer, if available. If reporting multiple middle names, hyphenate the middle names.	20	277-296	AN
33	Generation Code Used to distinguish Jr., Sr., II, III, etc. If not applicable, blank fill. Values available: J = Junior 3 = III 6 = VI 9 = IX S = Senior 4 = IV 7 = VII 2 = II 5 = V 8 = VIII	1	297	AN
34	Social Security Number Report the Social Security Number (SSN) of the primary consumer. Report only valid U.S.-issued SSNs. Reporting of this information is required as the Social Security Number greatly enhances accuracy in matching to the correct consumer. If the consumer does not have a SSN or one is not available for reporting, zero- or 9-fill all positions. Notes: If the Social Security Number is not reported, the Date of Birth is required to be reported. Do not report Individual Tax Identification Numbers (ITINs) in this field. ITINs do not prove identity outside the tax system and should not be offered or accepted as identification for non-tax purposes, per the Social Security Administration. Do not report Credit Profile Numbers (CPNs) in this field. The CPN should not be used for credit reporting purposes and does not replace the Social Security Number.	9	298-306	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
35	Date of Birth Report the full Date of Birth of the primary consumer, including the month, day and year. Reporting of this information is required as the Date of Birth greatly enhances accuracy in matching to the correct consumer. Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. Notes: If the Date of Birth is not reported, the Social Security Number is required to be reported. When reporting Authorized Users (ECOA Code 3), the full Date of Birth (MMDDYYYY) must be reported for all newly-added Authorized Users on all pre-existing and newly-opened accounts, even if the Social Security Number is reported. Do not report accounts of consumers who are too young to enter into a binding contract.	8	307-314	N
36	Telephone Number Contains the telephone number of the primary consumer (Area Code + 7 digits).	10	315-324	N
37	ECOA Code Defines the relationship of the primary consumer to the account and designates the account as joint, individual, etc., in compliance with the Equal Credit Opportunity Act. Exhibit 10 provides a list of ECOA Codes, their definitions and usage. For important information: <ul style="list-style-type: none"> Guidelines on reporting consumers who are personally liable for business accounts – refer to Frequently Asked Question 20. Usage guidelines on ECOA Codes T (Terminated) and Z (Delete Consumer) – refer to Frequently Asked Question 14(b). Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.	1	325	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
38	<p>Consumer Information Indicator</p> <p>Contains a value that indicates a special condition of the account that applies to the primary consumer.</p> <p>This special condition may be that a bankruptcy was filed, discharged, dismissed or withdrawn; a debt was reaffirmed; or the consumer cannot be located or is now located.</p> <p>The indicator should be reported each month as long as the condition applies. As an option, the indicator may be reported one time and will remain on file until another Consumer Information Indicator or a Removal value is reported.</p> <p>Regardless of the method of reporting, the indicator will be deleted <i>only</i> when another Consumer Information Indicator or a Removal value (Q, S, U) is reported.</p> <p>Exhibit 11 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines, refer to Frequently Asked Questions 23 through 32 (bankruptcy) and 61 (personal receivership).</p>	2	326-327	AN
39	<p>Country Code</p> <p>Contains the standard two-character country abbreviation.</p> <p>Exhibit 12 provides a list of the Country Codes.</p>	2	328-329	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
40	<p>First Line of Address</p> <p>Contains billing/mailling address for the primary consumer. If the consumer has a U.S. address and a foreign address, report the U.S. address. If the consumer has never used the U.S. address as a billing/mailling address (e.g., a property address), report the foreign address.</p> <p>If the billing/mailling address does not belong specifically to the consumer, such as a financial counseling site or bill paying service, report the consumer's home address.</p> <p>The First Line of Address usually includes street number, direction, street name, and type of thoroughfare.</p> <p>If the billing/mailling address is a PO Box or Rural Route, include Box or Route followed by the number (e.g., PO Box 100). Do not report both a street address and a PO Box.</p> <p>If the billing/mailling address is a private mailbox (PMB), the street address should be reported in the First Line of Address (e.g., 5678 Main Street). The PMB number should be reported in the Second Line of Address (e.g., PMB 1234). As an alternative, the entire address can be reported in the First Line of Address; for example, 5678 Main Street PMB 1234.</p> <p>Eliminate internal messages such as: "Do not mail", "Attorney", "Charge-off", "Chapter 13", "Fraud", "Trustee", "Estate of", "Care of", "M/R" (Mail Returned), etc.</p> <p>Exhibit 13 provides general rules for address reporting. Do not enter data furnisher's address in this field.</p>	32	330-361	AN
41	<p>Second Line of Address</p> <p>Contains second line of address, if needed, such as apartment or unit number, or private mailbox number (PMB).</p> <p>Eliminate internal messages such as: "Do not mail", "Attorney", "Charge-off", "Chapter 13", "Fraud", "Trustee", or "Estate of", "Care of", "M/R" (Mail Returned), etc.</p>	32	362-393	AN
42	<p>City</p> <p>Contains city name for address of primary consumer. Truncate rightmost positions if city name is greater than 20 characters or use standard 13-character U.S. Postal Service city abbreviations.</p>	20	394-413	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
43	State Contains the standard U.S. Postal Service state abbreviation for the address of the primary consumer. Exhibit 14 provides a list of State Codes.	2	414-415	AN
44	Postal/Zip Code Report the Zip Code of the primary consumer's address. Use entire field if reporting 9-digit zip codes. Otherwise, left-justify and blank fill.	9	416-424	AN
45	Address Indicator Contains one of the following values for the address reported in fields 40-44: C = Confirmed/Verified address Note: Value 'C' enables reporting a confirmed or verified address after receiving an address discrepancy notification from a consumer reporting agency. Report 'C' one time after the address is confirmed. Y = Known to be address of primary consumer N = Not confirmed address M = Military address S = Secondary Address B = Business address — not consumer's residence U = Non-deliverable address/Returned mail D = Data reporter's default address P = Bill Payer Service — not consumer's residence If indicator not available or unknown, blank fill.	1	425	AN
46	Residence Code Contains the one-character residence code of the address reported in fields 40-44. Values available: O = Owns R = Rents If not available or unknown, blank fill.	1	426	AN

Field Definitions

J1 Segment

Associated Consumer—Same Address

The J1 Segment is designed to accommodate the requirements of ECOA and applies when the associated consumer resides at the same address as the individual reported in the Base Segment. This segment must be present each time the account is reported.

Multiple occurrences of the J1 Segment can be appended to the Base Segment.

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of J1 .	2	1-2	AN
2	Reserved Blank fill. Field formerly used for Consumer Transaction Type.	1	3	AN
3	Surname Report the last name of the associated consumer. Titles and prefixes should not be reported. If the surname contains multiple names, such as Paternal Name-Maternal Name, hyphenate the surnames. For example, "SMITH-JONES" or "MARTINEZ-REYES" requires the hyphen. If the surname contains separate words, the hyphen is not required. For example, report "VAN DYKE" or "DE LA CRUZ" with a space between each word. Other than the hyphen, do not report special characters in any of the Consumer Name fields. The Generation Code should be reported in Field 6. Notes: Do not report minors. The name fields should not contain messages, such as "Parent of", "Baby", "Daughter", "Child", etc. Do not report trustee or estate accounts. In cases where the debt is included in a revocable trust and the consumer retains contractual responsibility, report the consumer's Full Name, Address, Social Security Number, and Date of Birth within the J1 Segment fields. Do not report the name of the trust.	25	4-28	AN

Field Definitions

J1 Segment

Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
4	First Name Report the full first name of the associated consumer. Names should not be abbreviated. Examples: Report first name "JUNIOR" (not "JR"); report "ROBERT" (not "ROBT"). If reporting multiple first names, hyphenate the first names. Note: If a consumer uses only initials for first and middle names (e.g., A.J.), the first name initial should be reported in the First Name field (e.g., A) and the middle initial should be reported in the Middle Name field (e.g., J).	20	29-48	AN
5	Middle Name Report the middle name or middle initial of the associated consumer, if available. If reporting multiple middle names, hyphenate the middle names.	20	49-68	AN
6	Generation Code Used to distinguish Junior, Senior, II, III, IV, etc. If not applicable, blank fill. Values available: J = Junior 3 = III 6 = VI 9 = IX S = Senior 4 = IV 7 = VII 2 = II 5 = V 8 = VIII	1	69	AN

Field Definitions

J1 Segment

Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
7	<p>Social Security Number Report the Social Security Number (SSN) of the associated consumer. Report only valid U.S.-issued SSNs.</p> <p>Reporting of this information is required as the Social Security Number greatly enhances accuracy in matching to the correct consumer.</p> <p>If the consumer does not have a SSN or one is not available for reporting, zero- or 9-fill all positions.</p> <p>Notes: If the Social Security Number is not reported, the Date of Birth is required to be reported.</p> <p>Do not report Individual Tax Identification Numbers (ITINs) in this field. ITINs do not prove identity outside the tax system and should not be offered or accepted as identification for non-tax purposes, per the Social Security Administration.</p> <p>Do not report Credit Profile Numbers (CPNs) in this field. The CPN should not be used for credit reporting purposes and does not replace the Social Security Number.</p>	9	70-78	N
8	<p>Date of Birth Report the full Date of Birth of the associated consumer, including the month, day and year.</p> <p>Reporting of this information is required as the Date of Birth greatly enhances accuracy in matching to the correct consumer.</p> <p>Format is MMDDYYYY.</p> <p>Notes: If the Date of Birth is not reported, the Social Security Number is required to be reported.</p> <p>When reporting Authorized Users (ECOA Code 3), the full Date of Birth (MMDDYYYY) must be reported for all newly-added Authorized Users on all pre-existing and newly-opened accounts, even if the Social Security Number is reported.</p> <p>Do not report accounts of consumers who are too young to enter into a binding contract.</p>	8	79-86	N

Field Definitions

J1 Segment

Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
9	Telephone Number Contains the telephone number of the associated consumer (Area Code + 7 digits).	10	87-96	N
10	ECOA Code Defines the relationship of the associated consumer to the account and designates the account as joint, individual, etc., in compliance with the Equal Credit Opportunity Act. Exhibit 10 provides a list of ECOA Codes, their definitions and usage. For important information: <ul style="list-style-type: none">Guidelines on reporting consumers who are personally liable for business accounts – refer to Frequently Asked Question 20.Usage guidelines on ECOA Codes T (Terminated) and Z (Delete Consumer) – refer to Frequently Asked Question 14(b). Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.	1	97	AN

Field Definitions

J1 Segment

Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
11	<p>Consumer Information Indicator Contains a value that indicates a special condition of the account that applies to the associated consumer.</p> <p>This special condition may be that a bankruptcy was filed, discharged, dismissed or withdrawn; a debt was reaffirmed; or the consumer cannot be located or is now located.</p> <p>The indicator should be reported each month as long as the condition applies. As an option, the indicator may be reported one time and will remain on file until another Consumer Information Indicator or a Removal value is reported.</p> <p>Regardless of the method of reporting, the indicator will be deleted <i>only</i> when another Consumer Information Indicator or a Removal value (Q, S, U) is reported.</p> <p>Exhibit 11 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines, refer to Frequently Asked Questions 23 through 32 (bankruptcy) and 61 (personal receivership).</p>	2	98-99	AN
12	<p>Reserved Blank fill.</p>	1	100	AN

Note: For additional reporting guidelines specific to the J1 Segment, refer to Frequently Asked Questions 6, 7 and 17 through 19.

Field Definitions

J2 Segment Associated Consumer—Different Address

The J2 Segment is designed to accommodate the requirements of ECOA and applies when the associated consumer resides at a different address than the individual reported in the Base Segment. The J2 Segment must always contain an address, even if the address is the same as the one reported in the Base Segment. This segment must be present each time the account is reported.

Multiple occurrences of the J2 Segment can be appended to the Base Segment.

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of J2 .	2	1-2	AN
2	Reserved Blank fill. Field formerly used for Consumer Transaction Type.	1	3	AN
3	Surname Report the last name of the associated consumer. Titles and prefixes should not be reported. If the surname contains multiple names, such as Paternal-Name-Maternal Name, hyphenate the surnames. For example, "SMITH-JONES" or "MARTINEZ-REYES" requires the hyphen. If the surname contains separate words, the hyphen is not required. For example, report "VAN DYKE" or "DE LA CRUZ" with a space between each word. Other than the hyphen, do not report special characters in any of the Consumer Name fields. The Generation Code should be reported in Field 6. Notes: Do not report minors. The name fields should not contain messages, such as "Parent of", "Baby", "Daughter", "Child", etc. Do not report trustee or estate accounts. In cases where the debt is included in a revocable trust and the consumer retains contractual responsibility, report the consumer's Full Name, Address, Social Security Number, and Date of Birth within the J2 Segment fields. Do not report the name of the trust.	25	4-28	AN

Field Definitions

J2 Segment

Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
4	First Name Report the full first name of the associated consumer. Names should not be abbreviated. Examples: Report first name "JUNIOR" (not "JR"); report "ROBERT" (not "ROBT"). If reporting multiple first names, hyphenate the first names. Note: If a consumer uses only initials for first and middle names (e.g., A.J.), the first name initial should be reported in the First Name field (e.g., A) and the middle initial should be reported in the Middle Name field (e.g., J).	20	29-48	AN
5	Middle Name Report the middle name or middle initial of the associated consumer, if available. If reporting multiple middle names, hyphenate the middle names.	20	49-68	AN
6	Generation Code Used to distinguish Junior, Senior, II, III, IV, etc. If not applicable, blank fill. Values available: J = Junior 3 = III 6 = VI 9 = IX S = Senior 4 = IV 7 = VII 2 = II 5 = V 8 = VIII	1	69	AN

Field Definitions

J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
7	<p>Social Security Number Report the Social Security Number (SSN) of the associated consumer. Report only valid U.S.-issued SSNs.</p> <p>Reporting of this information is required as the Social Security Number greatly enhances the accuracy in matching to the correct consumer.</p> <p>If the consumer does not have a SSN or if one is not available for reporting, zero- or 9-fill all positions.</p> <p>Notes: If the Social Security Number is not reported, the Date of Birth is required to be reported.</p> <p>Do not report Individual Tax Identification Numbers (ITINs) in this field. ITINs do not prove identity outside the tax system and should not be offered or accepted as identification for non-tax purposes, per the Social Security Administration.</p> <p>Do not report Credit Profile Numbers (CPNs) in this field. The CPN should not be used for credit reporting purposes and does not replace the Social Security Number.</p>	9	70-78	N

Field Definitions

J2 Segment

Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
8	<p>Date of Birth Report the Date of Birth of the associated consumer, including the month, day and year.</p> <p>Reporting of this information is required as the Date of Birth greatly enhances accuracy in matching to the correct consumer.</p> <p>Format is MMDDYYYY.</p> <p>Notes: If the Date of Birth is not reported, the Social Security Number is required to be reported.</p> <p>When reporting Authorized Users (ECOA Code 3), the full Date of Birth (MMDDYYYY) must be reported for all newly-added Authorized Users on all pre-existing and newly-opened accounts, even if the Social Security Number is reported.</p> <p>Do not report accounts of consumers who are too young to enter into a binding contract.</p>	8	79-86	N

Field Definitions

J2 Segment

Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
9	Telephone Number Contains the telephone number of the associated consumer (Area Code + 7 digits).	10	87-96	N
10	ECOA Code Defines the relationship of the associated consumer to the account and designates the account as joint, individual, etc., in compliance with the Equal Credit Opportunity Act. Exhibit 10 provides a list of ECOA Codes, their definitions and usage. For important information: <ul style="list-style-type: none"> Guidelines on reporting consumers who are personally liable for business accounts – refer to Frequently Asked Question 20. Usage guidelines on ECOA Codes T (Terminated) and Z (Delete Consumer) – refer to Frequently Asked Question 14(b). Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.	1	97	AN

Field Definitions

J2 Segment

Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
11	<p>Consumer Information Indicator Contains a value that indicates a special condition of the account that applies to the associated consumer.</p> <p>This special condition may be that a bankruptcy was filed, discharged, dismissed or withdrawn; a debt was reaffirmed; or the consumer cannot be located or is now located.</p> <p>The indicator should be reported each month as long as the condition applies. As an option, the indicator may be reported one time and will remain on file until another Consumer Information Indicator or a Removal value is reported.</p> <p>Regardless of the method of reporting, the indicator will be deleted <i>only</i> when another Consumer Information Indicator or a Removal value (Q, S, U) is reported.</p> <p>Exhibit 11 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines, refer to Frequently Asked questions 23 through 32 (bankruptcy) and 61 (personal receivership).</p>	2	98-99	AN
12	<p>Country Code Contains the standard two-character country abbreviation.</p> <p>Exhibit 12 provides a list of the Country Codes.</p>	2	100-101	AN

Field Definitions

J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
13	<p>First Line of Address Contains billing/mailling address for the associated consumer. If the consumer has a U.S. address and a foreign address, report the U.S. address. If the consumer has never used the U.S. address as a billing/mailling address (e.g., a property address), report the foreign address.</p> <p>If the billing/mailling address does not belong specifically to the consumer, such as a financial counseling site or bill paying service, report the consumer's home address.</p> <p>The First Line of Address usually includes street number, direction, street name, and type of thoroughfare.</p> <p>If the billing/mailling address is a PO Box or Rural Route, include Box or Route followed by the number (e.g., PO Box 100). Do not report both a street address and a PO Box.</p> <p>If the billing/mailling address is a private mailbox (PMB), the street address should be reported in the First Line of Address (e.g., 5678 Main Street). The PMB number should be reported in the Second Line of Address (e.g., PMB 1234). As an alternative, the entire address can be reported in the First Line of Address; for example, 5678 Main Street PMB 1234.</p> <p>Eliminate internal messages such as: "Do not mail", "Attorney", "Charge-off", "Chapter 13", "Fraud", "Trustee", "Estate of", "Care of", "M/R" (Mail Returned), etc.</p> <p>Exhibit 13 provides general rules for address reporting.</p> <p>Do not enter data furnisher's address in this field.</p>	32	102-133	AN
14	<p>Second Line of Address Contains second line of address, if needed, such as apartment or unit number, or private mailbox number (PMB).</p> <p>Eliminate internal messages such as: "Do not mail", "Attorney", "Charge-off", "Chapter 13", "Fraud", "Trustee", "Estate of", "Care of", "M/R" (Mail Returned), etc.</p>	32	134-165	AN
15	<p>City Contains city name for address of associated consumer. Truncate rightmost positions if city name is greater than 20 characters or use standard 13-character U.S. Postal Service city abbreviations.</p>	20	166-185	AN

Field Definitions

J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
16	State Contains the standard U.S. Postal Service state abbreviation for the address of the associated consumer. Exhibit 14 provides a list of State Codes.	2	186-187	AN
17	Postal/Zip Code Report the Zip Code of the associated consumer's address. Use entire field if reporting 9-digit zip codes. Otherwise, left-justify and blank fill.	9	188-196	AN
18	Address Indicator Contains one of the following values for the address reported in fields 13-17: C = Confirmed/Verified address Note: Value 'C' enables reporting a confirmed or verified address after receiving an address discrepancy notification from a consumer reporting agency. Report 'C' one time after the address is confirmed. Y = Known to be address of associated consumer N = Not confirmed address M = Military address S = Secondary address B = Business address — not consumer's residence U = Non-deliverable address/Returned mail D = Data reporter's default address P = Bill Payer Service — not consumer's residence If indicator not available or unknown, blank fill.	1	197	AN
19	Residence Code Contains the one-character residence code of the address reported in fields 13-17. Values available: O = Owns R = Rents If not available or unknown, blank fill.	1	198	AN
20	Reserved Blank fill.	2	199-200	AN

Note: For additional reporting guidelines specific to the J2 Segment, refer to Frequently Asked Questions 6, 7 and 17 through 20.

Field Definitions

K1 Segment Original Creditor Name

The K1 Segment must be present each time the account is reported. The segment is required for collection agencies, debt buyers and check guarantee companies. This segment may also be reported by student loan guaranty agencies, the U.S. Department of Education, and the U.S. Treasury.

The purpose of reporting the original creditor name is to help consumers identify the source of accounts when they appear on credit reports. Without the original creditor names, consumers may not know what the accounts represent.

Some state laws and CDIA policy stipulate that the original client/creditor must be identified. Federal law stipulates that the name of the payee must be identified when reporting returned checks.

Only one occurrence of the K1 Segment can be appended to the Base Segment. If not applicable, do not report the K1 Segment.

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of K1 .	2	1-2	AN

(continued)

Field Definitions

K1 Segment Original Creditor Name

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
2	Original Creditor Name This field is required and the content is dependent on the type of reporter. Collection Agencies: Report the name of the company/creditor, including any partnering affinity name ¹ , that originally opened the account for the consumer, even if the account had been turned over to multiple collection agencies. Debt Buyers: Report the name of the company/creditor, including any partnering affinity name ¹ , that originally opened the account for the consumer, even if the account had been sold multiple times to different debt buyers. Refer to the K2 Segment for "purchased from" information. Companies Reporting Returned Checks: Report the name of the payee; i.e., name of company to which the check was written. Refer to Frequently Asked Question 15 for additional guidelines on reporting returned checks. Student Loan Guarantors/U.S. Department of Education: Report the name of the original student loan lender. U.S. Treasury: Report the name of the government agency that is the original creditor. One of the following three options should be used when reporting a creditor's name that would reveal sensitive information about the consumer. 1. Report the name of the institution, but do not include reference to the type of service. For example, use the hospital name without identifying that it was the psychiatric unit that provided care. If a hospital's name reveals sensitive information, abbreviate the name. 2. Use the corporate name if it is different from the commercial name of a mental institution or drug rehabilitation center. 3. Do not report the account if either of the above two options would not sufficiently protect the consumer's privacy. Note: Encoded information is not acceptable in this field.	30	3-32	AN

(continued)

¹ The Affinity Name further identifies or provides linkage detail for the relationship of the original creditor to any connecting or supporting entities (e.g., ABC BANK THE HOME STORE).

Field Definitions

K1 Segment Original Creditor Name

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
3	Creditor Classification Contains a code which must be reported to indicate the general type of business for the Original Creditor Name. Values available: 01 = Retail 02 = Medical/Health Care <i>Required when reporting medical debts and returned checks from providers of medical services, products or devices</i> 03 = Oil Company 04 = Government 05 = Personal Services 06 = Insurance 07 = Educational 08 = Banking 09 = Rental/Leasing 10 = Utilities 11 = Cable/Cellular 12 = Financial (other non-banking financial institutions) 13 = Credit Union 14 = Automotive 15 = Check Guarantee	2	33-34	N

Note: To assist with compliance of the Fair Credit Reporting Act, companies who report medical debts or returned checks for medical purposes must report Creditor Classification '02' to indicate 'Medical/Health Care'. The actual name of the original creditor should continue to be reported in the Original Creditor Name (Field 2).

Field Definitions

K2 Segment Purchased From/Sold To

The K2 Segment may be used to report the name of the company from which the account was purchased or the name of the company to which the account was sold. The K2 Segment should be reported only one time per record to affect the change.

Only one occurrence of the K2 Segment can be appended to the Base Segment. If not applicable, do not report the K2 Segment.

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of K2 .	2	1-2	AN
2	Purchased From/Sold To Indicator Contains a code representing the type of information being reported. Values available: 1 = Purchased From Name 2 = Sold To Name 9 = Remove Previously Reported K2 Segment Information	1	3	N
3	Purchased From or Sold To Name Contains the name of the company from which the account was purchased or to which the account was sold. If field 2 = 9, this field should be blank filled.	30	4-33	AN
4	Reserved Blank fill.	1	34	AN

Notes: For reporting guidelines for accounts sold to another company or accounts purchased from another company, refer to Frequently Asked Questions 47 & 48.

The K2 segment should *not* be reported by collection agencies, check guarantee companies, student loan guaranty agencies and the U.S. Department of Education.

The K2 Segment may be reported by debt buyers when the name of the company from which the account was purchased is different from the original creditor's name, which is reported in the K1 Segment. If the original creditor and the company from which the account was purchased are the same, the K2 Segment should not be reported.

Field Definitions

K3 Segment Mortgage Information

The K3 Segment is used for two purposes:

1. To indicate a secondary marketing agency's interest in a loan by providing the applicable account number as assigned by the secondary marketing agency.
2. To report the Mortgage Identification Number (MIN), when available.

This segment must be present each time the account is reported. Only one occurrence of the K3 Segment can be appended to the Base Segment. If not applicable, do not report the K3 Segment.

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of K3 .	2	1-2	AN
2	Agency Identifier Contains a code indicating which secondary marketing agency has interest in this loan. Values available: 00 = Agency Identifier not applicable (Used when reporting MIN only) 01 = Fannie Mae 02 = Freddie Mac	2	3-4	N
3	Account Number Contains the account number as assigned by the secondary marketing agency. Do not include embedded blanks or special characters. If field 2 = 00, this field should be blank filled.	18	5-22	AN
4	Mortgage Identification Number (MIN) Contains the Mortgage Identification Number assigned to a mortgage loan. Do not include embedded blanks or special characters. The MIN indicates that the loan is registered with the Mortgage Electronic Registration Systems, Inc. (MERS), the electronic registry for tracking the ownership of mortgage rights. For more information, see http://www.mersinc.org .	18	23-40	AN

Field Definitions

K4 Segment Specialized Payment Information

The K4 Segment should be used to report information on specialized payment schedules for any type of loan for either deferred payments or balloon payments, which may include principal forbearance. This segment must be present each time the account is reported if a deferred or balloon payment applies to the account.

If an account has both deferred and balloon payments, report the Deferred Payment Start Date as long as payments are deferred. When the account is in repayment, report the Balloon Payment Due Date and Amount.

If an account has multiple balloon payments, only one can be reported at a time. When one balloon payment has been paid, the next one due can be reported.

Only one occurrence of the K4 Segment can be appended to the Base Segment. If not applicable, or the deferred payment start date or the balloon payment due date is not known, do not report the K4 Segment.

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of K4 .	2	1-2	AN
2	Specialized Payment Indicator Contains a code describing the specialized payment arrangements. Values available: 01 = Balloon Payment 02 = Deferred Payment	2	3-4	N
3	Deferred Payment Start Date Report the date the first payment is due for deferred loans. Format is MMDDYYYY. If the day is not available, use 01. This date should be reported when the Terms Frequency (Base Segment, Field 14) indicates Deferred. Refer to Frequently Asked Question 44 for guidelines on reporting deferred loans.	8	5-12	N
4	Balloon Payment Due Date Report the date the balloon payment is due, if applicable. Format is MMDDYYYY. If the day is not available, use 01.	8	13-20	N
5	Balloon Payment Amount Report the amount of the balloon payment in whole dollars only.	9	21-29	N
6	Reserved Blank fill.	1	30	AN

Note: All other account information should be reported in the Base Segment.

Field Definitions

L1 Segment

Account Number/Identification Number Change

The L1 Segment provides an automated method for changing the Consumer Account Number and/or Identification Number and should be reported only one time per record to affect the change.

The L1 Segment contains the new Consumer Account Number and/or the new Identification Number and the Base Segment contains the old Consumer Account Number (Field 7) and/or old Identification Number (field 5) exactly as reported previously. In any subsequent reporting period, the Base Segment should contain the new Consumer Account Number and/or new Identification Number, and the L1 Segment should not be reported.

If the L1 Segment is being reported for the first time, or if L1 Segments are to be used for portfolio acquisition or a mass Consumer Account Number and/or Identification Number change, contact your consumer reporting agencies.

Only one occurrence of the L1 Segment can be appended to the Base Segment.

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of L1 .	2	1-2	AN
2	Change Indicator Contains a code representing the change being reported. Values available: 1 = Consumer Account Number Change ONLY 2 = Identification Number Change ONLY 3 = Consumer Account Number AND Identification Number Change	1	3	N
3	New Consumer Account Number Contains the new Account Number assigned to this account. Do not include embedded blanks or special characters. If field 2 = 2, this field should be blank filled.	30	4-33	AN

(continued)

Field Definitions

L1 Segment

Account Number/Identification Number Change

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
4	New Identification Number Contains the new Identification Number assigned to this account. Do not include embedded blanks or special characters. If field 2 = 1, this field should be blank filled.	20	34-53	AN
5	Reserved Blank fill.	1	54	AN

Notes: For additional reporting guidelines specific to the L1 Segment, refer to Frequently Asked Question and Answer 5.

If fixed-length records are being reported and a record does not require a Consumer Account Number or Identification Number change, the Segment Identifier of *L1* must be reported and the remainder of the segment must be blank filled.

Field Definitions

N1 Segment Employment

The N1 Segment may be used to report employment information for the consumer reported in the Base Segment.

Only one occurrence of the N1 Segment can be appended to the Base Segment. If employment is not available, do not report the N1 Segment.

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of N1 .	2	1-2	AN
2	Employer Name Report the name of the employer for the consumer reported in the Base Segment.	30	3-32	AN
3	First Line of Employer Address Contains the mailing address for the employer in Field 2 and usually includes street number, direction, street name and type of thoroughfare.	32	33-64	AN
4	Second Line of Employer Address Contains second line of employer's address, if needed.	32	65-96	AN
5	Employer City Contains city name for employer's address. Truncate rightmost positions if city name is greater than 20 characters or use standard 13-character U.S. Postal Service city abbreviations.	20	97-116	AN
6	Employer State Contains the standard U.S. Postal Service state abbreviation for the address of the employer. Exhibit 14 provides a list of State Codes.	2	117-118	AN
7	Employer Postal/Zip Code Report the zip code of the employer's address. Use entire field if reporting 9-digit zip codes. Otherwise, left-justify and blank fill.	9	119-127	AN

(continued)

Field Definitions

N1 Segment Employment

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
8	Occupation Report title or position for consumer reported in the Base Segment (the employee).	18	128-145	AN
9	Reserved Blank fill.	1	146	AN

Field Definitions

Trailer Record

The Trailer Record must be the last record provided on the file. It includes cumulative totals that are used to verify that all records received have been processed.

FIELD	FIELD NAME & DESCRIPTION	426 Character Format ¹		
		Length	Position	Recording Technique
1	Record Descriptor Word (RDW) Contains a value equal to the length of the physical record. This value includes the four bytes reserved for this field. If fixed-length records are being reported, the Trailer Record should be the same length as all the data records. The Trailer Record should be padded with blanks to fill the needed number of positions.	4	1-4	N
2	Record Identifier Contains a constant of TRAILER which is used to identify this record.	7	5-11	AN
3	Total Base Records Contains the total number of Base Segments being reported.	9	12-20	N
4	Reserved Blank fill.	9	21-29	AN
5	Total of Status Code DF Contains the total number of Base Segments with Status Code DF in Field 17A.	9	30-38	N
6	Total Associated Consumer Segments (J1) Contains the total number of J1 Segments being reported. Do not count blank- or 9-filled segments.	9	39-47	N
7	Total Associated Consumer Segments (J2) Contains the total number of J2 Segments being reported. Do not count blank- or 9-filled segments.	9	48-56	N
8	Block Count Contains the number of blocks on the file, if applicable.	9	57-65	N
9	Total of Status Code DA Contains the total number of Base Segments with Status Code DA in Field 17A.	9	66-74	N
10	Total of Status Code 05 Contains the total number of Base Segments with Status Code 05 in Field 17A.	9	75-83	N
11	Total of Status Code 11 Contains the total number of Base Segments with Status Code 11 in Field 17A.	9	84-92	N

¹ For 366 Packed Format specifications, refer to the Record Layouts section of the Metro 2[®] Format module.

Field Definitions

Trailer Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
12	Total of Status Code 13 Contains the total number of Base Segments with Status Code 13 in Field 17A.	9	93-101	N
13	Total of Status Code 61 Contains the total number of Base Segments with Status Code 61 in Field 17A.	9	102-110	N
14	Total of Status Code 62 Contains the total number of Base Segments with Status Code 62 in Field 17A.	9	111-119	N
15	Total of Status Code 63 Contains the total number of Base Segments with Status Code 63 in Field 17A.	9	120-128	N
16	Total of Status Code 64 Contains the total number of Base Segments with Status Code 64 in Field 17A.	9	129-137	N
17	Total of Status Code 65 Contains the total number of Base Segments with Status Code 65 in Field 17A.	9	138-146	N
18	Total of Status Code 71 Contains the total number of Base Segments with Status Code 71 in Field 17A.	9	147-155	N
19	Total of Status Code 78 Contains the total number of Base Segments with Status Code 78 in Field 17A.	9	156-164	N
20	Total of Status Code 80 Contains the total number of Base Segments with Status Code 80 in Field 17A.	9	165-173	N
21	Total of Status Code 82 Contains the total number of Base Segments with Status Code 82 in Field 17A.	9	174-182	N
22	Total of Status Code 83 Contains the total number of Base Segments with Status Code 83 in Field 17A.	9	183-191	N
23	Total of Status Code 84 Contains the total number of Base Segments with Status Code 84 in Field 17A.	9	192-200	N
24	Total of Status Code 88 Contains the total number of Base Segments with Status Code 88 in Field 17A.	9	201-209	N

Field Definitions

Trailer Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
25	Total of Status Code 89 Contains the total number of Base Segments with Status Code 89 in Field 17A.	9	210-218	N
26	Total of Status Code 93 Contains the total number of Base Segments with Status Code 93 in Field 17A.	9	219-227	N
27	Total of Status Code 94 Contains the total number of Base Segments with Status Code 94 in Field 17A.	9	228-236	N
28	Total of Status Code 95 Contains the total number of Base Segments with Status Code 95 in Field 17A.	9	237-245	N
29	Total of Status Code 96 Contains the total number of Base Segments with Status Code 96 in Field 17A.	9	246-254	N
30	Total of Status Code 97 Contains the total number of Base Segments with Status Code 97 in Field 17A.	9	255-263	N
31	Total of ECOA Code Z (All Segments) Contains the total number of records with ECOA Code Z being reported in the Base Segment (Field 37), in the J1 Segment (Field 10) and in the J2 Segment (Field 10).	9	264-272	N
32	Total Employment Segments Contains the total number of records with employment being reported in the N1 Segment.	9	273-281	N
33	Total Original Creditor Segments Contains the total number of records with Original Creditors being reported in the K1 Segment.	9	282-290	N
34	Total Purchased From/Sold To Segments Contains the total number of records with Purchased From/Sold To being reported in the K2 Segment.	9	291-299	N
35	Total Mortgage Information Segments Contains the total number of records with Mortgage Information being reported in the K3 Segment.	9	300-308	N
36	Total Specialized Payment Information Segments Contains the total number of records with Specialized Payment Information being reported in the K4 Segment.	9	309-317	N
37	Total Change Segments Contains the total number of Consumer Account Number and/or Identification Number changes being reported in the L1 Segment.	9	318-326	N

Field Definitions

Trailer Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
38	Total Social Security Numbers (All Segments) Contains the total number of valid Social Security Numbers reported in the Base Segment (Field 34), in the J1 Segment (Field 7) and in the J2 Segment (Field 7). Do not count zero- or 9-filled SSNs.	9	327-335	N
39	Total Social Security Numbers (Base Segments) Contains the total number of valid Social Security Numbers reported in the Base Segment (Field 34). Do not count zero- or 9-filled SSNs.	9	336-344	N
40	Total Social Security Numbers (J1 Segments) Contains the total number of valid Social Security Numbers reported in the J1 Segment (Field 7). Do not count zero- or 9-filled SSNs.	9	345-353	N
41	Total Social Security Numbers (J2 Segments) Contains the total number of valid Social Security Numbers reported in the J2 Segment (Field 7). Do not count zero- or 9-filled SSNs.	9	354-362	N
42	Total Dates of Birth (All Segments) Contains the total number of valid Dates of Birth reported in the Base Segment (Field 35), in the J1 Segment (Field 8) and in the J2 Segment (Field 8). Do not count zero-filled Dates of Birth.	9	363-371	N
43	Total Dates of Birth (Base Segments) Contains the total number of valid Dates of Birth reported in the Base Segment (Field 35). Do not count zero-filled Dates of Birth.	9	372-380	N
44	Total Dates of Birth (J1 Segments) Contains the total number of valid Dates of Birth reported in the J1 Segment (Field 8). Do not count zero-filled Dates of Birth.	9	381-389	N
45	Total Dates of Birth (J2 Segments) Contains the total number of valid Dates of Birth reported in the J2 Segment (Field 8). Do not count zero-filled Dates of Birth.	9	390-398	N
46	Total Telephone Numbers (All Segments) Contains the total number of valid Telephone Numbers reported in the Base Segment (Field 36), in the J1 Segment (Field 9) and in the J2 Segment (Field 9). Do not count zero-filled Telephone Numbers.	9	399-407	N
47	Reserved Blank fill.	19	408-426	AN

Exhibit 1

Account Type Codes by Industry

The following table describes the account type codes that are reported in Field 9.

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
00	Auto	X			X			X			X		
01	Unsecured	X			X			X			X		
02	Secured ¹	X			X			X			X		
03	Partially Secured	X			X			X			X		
04	Home Improvement	X			X			X	X				
05	FHA Home Improvement	X			X			X	X				
06	Installment Sales Contract ¹									X	X		X
07	Charge Account ¹									X	X		
08	Real estate, specific type unknown (Terms Duration in years) Report specific real estate type codes, when known. Refer to codes 19, 25, 26, 6B, 2C.	X			X				X				
10	Business Loan	X			X			X					
11	Recreational Merchandise	X			X			X			X		

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
12	Education	X			X		X	X				X	
13	Lease ¹	X			X			X			X		
15	Line of Credit ¹	X			X			X				X	
17	Manufactured Housing	X			X			X	X		X		
18	Credit Card	X		X	X			X					
19	FHA Real Estate Mortgage (Terms Duration in years)	X			X				X				
20	Note Loan	X			X			X					
25	VA Real Estate Mortgage (Terms Duration in years)	X			X				X				
26	Conventional Real Estate Mortgage — including Purchase Money First ¹ (Terms Duration in years)	X			X				X				
29	Rental Agreement Note: Used by rental companies												
37	Combined Credit Plan ¹	X		X	X								

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
43	Debit Card ¹	X			X			X					
47	Credit Line Secured	X			X			X					
48	Collection Agency/Attorney					X							
50	Family Support		X										
65	Government Unsecured Guaranteed Loan						X						
66	Government Secured Guaranteed Loan						X						
67	Government Unsecured Direct Loan						X						
68	Government Secured Direct Loan						X						
69	Government Grant						X						
70	Government Overpayment						X						
71	Government Fine						X						
72	Government Fee for Services						X						

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
73	Government Employee Advance						X						
74	Government Misc. Debt						X						
75	Government Benefit						X						
77	Returned Check ¹					X							
89	Home Equity Line of Credit	X			X				X				
90	Medical Debt	X			X			X					
91	Debt Consolidation ¹	X			X			X					
92	Utility Company												X
93	Child Support		X										
95	Attorney Fees ¹	X			X								
0A	Time Share Loan ¹	X			X			X	X				
2A	Secured Credit Card ¹	X		X	X								
3A	Auto Lease ¹	X			X			X			X		

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
5A	Real Estate — Junior Liens and Non-Purchase Money First ¹ (Terms Duration in years)	X			X				X				
6A	Commercial Installment Loan ¹	X			X			X					
7A	Commercial Line of Credit ¹	X			X			X					
8A	Business Credit Card ¹	X		X	X								
9A	Secured Home Improvement	X			X			X	X				
5B	Second Mortgage (Terms Duration in years)	X			X				X				
6B	Commercial Mortgage Loan ¹ (Terms Duration in years)	X			X				X				
7B	Agricultural	X			X			X			X		
8B	Deposit Account with Overdraft Protection ¹	X			X								
9B	Business Line Personally Guaranteed	X			X			X					
0C	Debt Buyer					X							

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
2C	U.S. Department of Agriculture (USDA) Real Estate Mortgage Loan (Terms Duration in years)	X			X				X				
4D	Telecommunications/Cellular												X
6D	Home Equity ¹	X			X				X				
0F	Construction Loan	X			X			X	X				
0G	Flexible Spending Credit Card ¹	X		X	X								

Note: Account Type Codes 22 (Secured by Household Goods), 23 (Secured by Household Goods & Other Collateral) and 1C (Household Goods) are obsolete as of September 2011 and may no longer be reported.

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 2

Account Type Codes within Portfolio Type

The following table contains an alphabetic listing of the Account Type Codes and their corresponding Portfolio Types.

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
7B	Agricultural		X			
95	Attorney Fees <i>To be used to report an unsecured loan for the purpose of paying attorney fees.</i>		X			
00	Auto		X			
3A	Auto Lease <i>Refer to Frequently Asked Question 36 for guidelines specific to terminated leases and Frequently Asked Question 37 for guidelines specific to prepaid auto leases.</i>		X			
8A	Business Credit Card <i>Individual is personally liable.</i>				X	X
9B	Business Line Personally Guaranteed	X				
10	Business Loan		X			
07	Charge Account <i>Used by the Retail Store industry.</i>					X
93	Child Support				X	
48	Collection Agency/Attorney				X	
37	Combined Credit Plan <i>Represents two credit plans being reported as one account. Example: Visa and MasterCard on one bill.</i>				X	X

(continued)

Exhibit 2

Account Type Codes within Portfolio Type

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
6A	Commercial Installment Loan <i>Individual is personally liable; company is guarantor.</i>		X			
7A	Commercial Line of Credit <i>Individual is personally liable; company is guarantor.</i>	X				
6B	Commercial Mortgage Loan <i>Terms Duration in years. Individual is personally liable; company is guarantor.</i>			X		
0F	Construction Loan		X			
26	Conventional Real Estate Mortgage - including Purchase Money First <i>Terms Duration in years. Purchase Money First means that the proceeds of the loan are used to buy the property. This is a mortgage account that is not guaranteed by a government agency.</i>			X		
18	Credit Card				X	X
47	Credit Line Secured	X				
43	Debit Card <i>To be used when debit card is backed by a line of credit or overdraft protection. Refer to Frequently Asked Question 33 for guidelines specific to debit cards.</i>	X			X	X
0C	Debt Buyer				X	

(continued)

Exhibit 2

Account Type Codes within Portfolio Type

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
91	Debt Consolidation <i>Represents multiple loans which have been consolidated into one loan.</i>		X			
8B	Deposit Account with Overdraft Protection <i>Overdrawn account. Refer to Frequently Asked Question 59 for reporting guidelines.</i>				X	
12	Education		X		X	
50	Family Support				X	
05	Federal Housing Administration (FHA) Home Improvement Loan		X			
19	Federal Housing Administration (FHA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>			X		
0G	Flexible Spending Credit Card <i>Credit card with no preset spending limit. The credit card has a Credit Limit, but the terms of the card allow the consumer to exceed that amount. Refer to Frequently Asked Question 51 for reporting guidelines.</i>					X
75	Government Benefit		X		X	
73	Government Employee Advance		X		X	
72	Government Fee for Services		X		X	
71	Government Fine		X		X	

(continued)

Exhibit 2

Account Type Codes within Portfolio Type

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
69	Government Grant		X		X	
74	Government Miscellaneous Debt		X		X	
70	Government Overpayment		X		X	
68	Government Secured Direct Loan		X		X	
66	Government Secured Guaranteed Loan		X		X	
67	Government Unsecured Direct Loan		X		X	
65	Government Unsecured Guaranteed Loan		X		X	
6D	Home Equity <i>Installment payments.</i>		X			
89	Home Equity Line of Credit	X				
04	Home Improvement		X			
06	Installment Sales Contract <i>Used by the Retail Industry.</i>		X			
13	Lease <i>Non-auto.</i>		X			
15	Line of Credit <i>Personal line of credit – not secured by collateral. Includes Check Credit.</i>	X				
17	Manufactured Housing		X			

(continued)

Exhibit 2

Account Type Codes within Portfolio Type

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
90	Medical Debt		X		X	
20	Note Loan		X			
03	Partially Secured		X			
5A	Real Estate - Junior Liens and Non-Purchase Money First <i>Terms Duration in years. Junior Liens means that a person has a mortgage on property already and needs more money without paying off existing loan; second mortgage, third or more. Non-Purchase Money First means that the proceeds of the loan are not used directly for the property. This is a real estate account type.</i>			X		
08	Real estate, specific type unknown <i>Terms Duration in years. Report specific real estate type codes, when known. Refer to codes 19, 25, 26, 6B, 2C.</i>			X		
11	Recreational Merchandise		X			
29	Rental Agreement		X			
77	Returned Check <i>Reported by Collection Agencies, Debt Buyers and Check Guarantee companies when a check was returned to the payee for non-payment usually due to insufficient funds. Refer to Frequently Asked Question 15 for reporting requirements.</i>				X	
5B	Second Mortgage <i>Terms Duration in years.</i>			X		

(continued)

Exhibit 2

Account Type Codes within Portfolio Type

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
02	Secured <i>Used for Installment Contracts.</i>		X			
2A	Secured Credit Card <i>Deposited funds are available in the event of default.</i>				X	X
9A	Secured Home Improvement		X			
4D	Telecommunications/Cellular				X	
0A	Time Share Loan <i>A purchased time share. Refer to Frequently Asked Question 66 for reporting guidelines.</i>		X			
01	Unsecured		X			
2C	U.S. Department of Agriculture (USDA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>			X		
92	Utility Company				X	
25	Veteran's Administration (VA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>			X		

Note: Account Type Codes 22 (Secured by Household Goods), 23 (Secured by Household Goods & Other Collateral) and 1C (Household Goods) are obsolete as of September 2011 and may no longer be reported.

Exhibit 3

Terms/Payment Amount Conversion to Monthly

The following table contains the calculations to be used to convert the Terms Duration (number of payment intervals) and Scheduled Monthly Payment Amount to monthly values.

Terms Frequency Field 14	Terms Duration Field 13	Scheduled Monthly Payment Amount Field 15
D = Deferred	Blank fill	Zero fill
P = Single Payment Loan	001	Zero fill
W = Weekly (Due every week)	Divide by 4.33	Multiply by 4.33
B = Biweekly (Due every 2 weeks)	Divide by 2.16	Multiply by 2.16
E = Semimonthly (Due twice a month)	Divide by 2	Multiply by 2
M = Monthly (Due every month)	As given	As given
L = Bimonthly (Due every 2 months)	Multiply by 2	Divide by 2
Q = Quarterly (Due every 3 months)	Multiply by 3	Divide by 3
T = Triannually (Due every 4 months)	Multiply by 4	Divide by 4
S = Semiannually (Due twice a year)	Multiply by 6	Divide by 6
Y = Annually (Due every year)	Multiply by 12	Divide by 12

Note: Report whole dollars only in the Scheduled Monthly Payment Amount field.

Exhibit 4

Account Status Codes

Enter the Account Status Code (Field 17A) that properly identifies the current condition of the account as of the Date of Account Information (Field 24).

Code	Description
05 ¹ & 2	Account transferred <i>Requires Current Balance and Amount Past Due = zero.</i> IMPORTANT NOTE: Account Status 05 will become obsolete for reporting in April 2022. <i>Refer to the Transferred category within Exhibit 6 for a list of Special Comment Codes that should be used instead of Account Status 05. Refer to Frequently Asked Question & Answer 46 for guidance on reporting transferred accounts, and to Frequently Asked Question & Answer 47 for guidance on reporting sold accounts.</i>
11	Current account (0-29 days past the due date) <i>For Installment and Mortgage loans, the account should be current and have a non-zero Balance Amount. For Credit Line, Open and Revolving portfolio types, the account should be current and available for use. If the account is closed, but there is a balance due, Special Comment Code M or Compliance Condition Code XA should also be reported to indicate the account is no longer available for use.</i>
13 ¹ & 2	Paid or closed account/zero balance <i>For Installment and Mortgage loans, the account should be paid with a zero Balance Amount. For Credit Line, Open and Revolving portfolio types, the account should no longer be available for use, and the Balance Amount should be zero. A Special Comment Code M or Compliance Condition Code XA may also be reported to indicate the account is closed.</i>
61 ²	Account paid in full, was a voluntary surrender <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to Frequently Asked Question & Answer 63 for reporting guidelines.</i>
62 ²	Account paid in full, was a collection account <i>Requires Current Balance and Amount Past Due = zero.</i>
63 ²	Account paid in full, was a repossession <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to Frequently Asked Question & Answer 62 for reporting guidelines.</i>
64 ²	Account paid in full, was a charge-off <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to Frequently Asked Question & Answer 34(b) for reporting guidelines.</i>
65 ¹ & 2	Account paid in full. A foreclosure was started. <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to Frequently Asked Question & Answer 52 for reporting guidelines.</i>

(continued)

¹ Field 17B (Payment Rating) is also required when reporting this Account Status Code.

² This Account Status Code is considered to be a final status, which does not require further updating.

Exhibit 4

Account Status Codes

Code	Description
71 ¹	Account 30-59 days past the due date
78 ¹	Account 60-89 days past the due date
80 ¹	Account 90-119 days past the due date
82 ¹	Account 120-149 days past the due date
83 ¹	Account 150-179 days past the due date
84 ¹	Account 180 days or more past the due date
88 ²	Claim filed with government for insured portion of balance on a defaulted loan
89 ²	Deed received in lieu of foreclosure on a defaulted mortgage; there may be a balance due <i>Refer to Frequently Asked Question & Answer 53 for reporting guidelines. Note: For credit reporting purposes, do not report Account Status Code 97 (Charge-off) after Account Status 89 has been reported.</i>
93	Account assigned to internal or external collections
94 ²	Foreclosure completed; there may be a balance due <i>Refer to Frequently Asked Question & Answer 52 for reporting guidelines. Note: For credit reporting purposes, do not report Account Status Code 97 (Charge-off) after Account Status 94 has been reported.</i>
95 ²	Voluntary surrender; there may be a balance due <i>Refer to Frequently Asked Question & Answer 63 for reporting guidelines. Note: Do not report Status Code 95 for early termination of leases. Refer to the Leasing category within Exhibit 6 for applicable Special Comments.</i>
96	Merchandise was repossessed; there may be a balance due <i>Refer to Frequently Asked Question & Answer 62 for reporting guidelines.</i>
97	Unpaid balance reported as a loss (charge-off) <i>Refer to Frequently Asked Questions & Answers 34(a) & (c) for reporting guidelines.</i>
DA	Delete entire account (for reasons other than fraud) Note: In order to maintain the integrity of credit information, it is important that data furnishers not ask for a subsequent deletion of account history unless an actual error was reported. Paid derogatory accounts, such as collections, should be reported as paid; they should not be deleted.
DF	Delete entire account due to confirmed fraud (fraud investigation completed)

¹ For Credit Line, Open and Revolving portfolio types, if the account is closed, Special Comment M or Compliance Condition Code XA should also be reported to indicate the account is no longer available for use.

² Field 17B (Payment Rating) is also required when reporting this Account Status Code.

Exhibit 5

Examples of Reporting Payment History Profile (Field 18)

The Account Status, which is reported in field 17A of the Base Segment, contains the status of the account as of the Date of Account Information. Field 18 contains up to 24 months of consecutive payment activity prior to the current reporting period.

Examples of Account Status and Payment History Profile (PHP):

A. Data furnisher who reports data on the last day of each month:

Account Status Code = 11; Date of Account Information = 01/31/2020 (represents the reporting period of 01/01/2020 through 01/31/2020)
PHP Field 18 = 000011000000EEEE0000BBBB

In the above example, field 18 data represents, from left to right, 12/31/2019 back through 01/31/2018. The E's indicate that the account was current with a zero balance in 12/2018, 11/2018, 10/2018 and 09/2018. The B's indicate that no payment history was available prior to 05/2018, which was most likely the date account was opened.

B. Data furnisher who reports data on the 15th of each month:

Account Status Code = 80; Date of Account Information = 01/15/2020 (represents the reporting period of 12/16/2019 through 01/15/2020); Date of First Delinquency = 08/11/2019; PHP Field 18 = 2211100000DD000101000000

In the above example, field 18 data represents, from left to right, data that was reported in the mid-month reporting periods of 12/15/2019 back through 01/15/2018. For example, the first position, which is 2 (60-89 days past the due date) represents that the account was 60 days delinquent in the 11/16/2019 through 12/15/2019 reporting period.

The D's indicate that no payment history was available for 02/2019 or 01/2019.

Note: The Date of First Delinquency (08/11/2019) represents the date of the first 30-day delinquency that led to the status being reported.

(continued)

Exhibit 5

Examples of Reporting Payment History Profile (Field 18)

C. Data furnisher who reports data on the 1st of each month:

Account Status Code = 11; Date of Account Information = 01/01/2020 (represents the reporting period of 12/02/2019 through 01/01/2020)

PHP Field 18 = 0EEEEEEEE000EEEE0000EE00

In the above example, field 18 data represents, from left to right, 12/01/2019 back through 01/01/2018. For example, the first position, which is 0 (0-29 days past the due date), represents that the account was current in the 11/2/2019 through 12/01/2019 reporting period.

The E's indicate that the account was current with a zero balance from 11/01/2019 back through 04/01/2019, from 12/01/2018 back through 09/01/2018, and from 04/01/2018 back through 03/01/2018. The account was current (and active) during the other months.

D. Account Status Code = 97; Date of Account Information = 01/31/2020 (represents the reporting period of 01/01/2020 through 01/31/2020); Date of First Delinquency = 06/30/2018; PHP Field 18 = LLGGGGGGGG66654332100010

In the above example, field 18 data represents, from left to right, 12/31/2019 back through 01/31/2018. The L's indicate that the account was a charge-off from 12/2019 and 11/2019, and the G's indicate that the account was a collection from 10/2019 back through 03/2019.

Note: The Date of First Delinquency (06/30/2018) represents the date of the 30-day delinquency that led to the charge off being reported.

Exhibit 6

Special Comment Codes – By Category within Portfolio

The Special Comment Code (Field 19) must be reported each month as long as the condition applies. If more than one Special Comment applies to an account, it is the data furnisher's decision to report the comment that is deemed most important from a business perspective for the current reporting period.

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Closed (Permanently or Temporarily)	Election of Remedy <i>Definition: A car or other item is repossessed, but the value is less than the balance due. The credit grantor must consider the account paid and cannot collect the difference in amounts.</i>	-	I	-	-	I
	Account Closed at Credit Grantor's Request (Requires Date Closed to identify the date the account was closed to further purchases/use.)	M	-	-	M	M
	Credit Line Suspended (Continue to report the last assigned Credit Limit. Account Status Code should not be 13 or 61-65. Does not require Date Closed to be reported since credit line is temporarily suspended.) <i>Definition: The credit line is temporarily unavailable for use.</i>	AP	-	-	AP	AP
	Account Closed Due to Refinance (Refer to Frequently Asked Question 42 for reporting guidelines.)	AS	AS	AS	-	-
	Account Closed Due to Transfer (Refer to Frequently Asked Question 46 for reporting guidelines.) <i>Note: Used for internal transfers.</i>	AT	AT	AT	AT	AT
	Credit Card Lost or Stolen (Refer to Frequently Asked Question 43 for reporting guidelines.)	-	-	-	BL	BL

(continued)

Exhibit 6

Special Comment Codes - By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Closed (Permanently or Temporarily) (continued)	Account Closed Due to Inactivity (Requires Date Closed to identify the date the account was closed to further purchases/use.)	CI	-	-	CI	CI
	Credit Line No Longer Available – In Repayment Phase (Continue to report the last assigned Credit Limit. Account Status Code should not be 13 or 61-65 and Current Balance should not be zero. Requires Date Closed to identify the date the account was closed to further purchases/use.) <i>Definition: To be used for line of credit accounts that have two phases: the borrowing phase and the repayment phase. The repayment phase is a natural progression for the account when the consumer is responsible for payment of the outstanding balance and the credit line is no longer available for use.</i>	CJ	-	-	-	-
	Credit Line Suspended due to Collateral Depreciation (Continue to report last assigned Credit Limit. Account Status Code should not be 13 or 61-65. Does not require Date Closed to be reported since credit line is temporarily suspended.) <i>Definition: To be used for Home Equity and other secured line of credit accounts when the credit line is temporarily unavailable for use.</i>	CL	-	-	-	-

(continued)

Exhibit 6

Special Comment Codes – By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Leasing	Full Termination/Status Pending (Requires Account Type 3A or 13)	-	BB	-	-	-
	Full Termination/Obligation Satisfied (Requires Account Type 3A or 13, Account Status Code 13 and Current Balance = 0)	-	BC	-	-	-
	Full Termination/Balance Owing (Requires Account Type 3A or 13. Refer to Frequently Asked Question 36 for reporting guidelines.)	-	BD	-	-	-
	Early Termination/Status Pending (Requires Account Type 3A or 13)	-	BE	-	-	-
	Early Termination/Obligation Satisfied (Requires Account Type 3A or 13, Account Status Code 13 and Current Balance = 0)	-	BF	-	-	-
	Early Termination/Balance Owing (Requires Account Type 3A or 13)	-	BG	-	-	-
	Early Termination/Insurance Loss (Requires Account Type 3A or 13)	-	BH	-	-	-

(continued)

Exhibit 6

Special Comment Codes - By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Leasing (continued)	Involuntary Repossession (Requires Account Type 3A or 13) <i>Note: Accounts with non-lease type codes should be reported with Account Status 63 (Paid, was a repossession) or 96 (Repossession), as applicable.</i>	-	BI	-	-	-
	Involuntary Repossession/Obligation Satisfied (Requires Account Type 3A or 13) <i>Note: Accounts with non-lease type codes should be reported with Account Status 63 (Paid, was a repossession).</i>	-	BJ	-	-	-
	Involuntary Repossession/Balance Owing (Requires Account Type 3A or 13) <i>Note: Accounts with non-lease type codes should be reported with Account Status 96 (Repossession).</i>	-	BK	-	-	-
	Prepaid Lease (Requires Account Type 3A or 13. Refer to Frequently Asked Question 37 for reporting guidelines.) <i>Definition: Consumer paid lease in advance. No monthly payments are due.</i>	-	BS	-	-	-
Legal Action	Account Payments Assured by Wage Garnishment	AM	AM	AM	AM	AM

(continued)

Exhibit 6

Special Comment Codes – By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Other	Special Handling - Contact Credit Grantor for Additional Information	S	S	S	S	S
	Adjustment Pending <i>Definition: Account adjustment, such as returned merchandise and refund due.</i>	V	V	V	V	V
	First Payment Never Received <i>Note: May indicate fraudulent activity</i>	AV	AV	AV	AV	AV
	Affected by Natural or Declared Disaster (Refer to Frequently Asked Question 58 for reporting guidelines.)	AW	AW	AW	AW	AW
	Redeemed or Reinstated Repossession	-	AZ	-	-	AZ
	Foreclosure Proceedings Started (Refer to Frequently Asked Question 52 for reporting guidelines.)	BO	-	BO	-	-
	Guaranteed/Insured	CH	CH	CH	CH	CH
	Credit Line Reduced due to Collateral Depreciation <i>Definition: To be used for Home Equity or other secured line of credit accounts.</i>	CK	-	-	-	-

(continued)

Exhibit 6

Special Comment Codes - By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Other (continued)	Collateral Released by Creditor / Balance Owing (Account Status Code should not be 13 or 61-65 and Current Balance should not be zero.) <i>Definition: To be used for Mortgages, Home Equity or other secured accounts when the collateral is released, but the consumer still has an outstanding balance to repay.</i>	CM	CM	CM	-	CM
	Loan Modified under a Federal Government Plan	CN	CN	CN	CN	CN
	Loan Modified <i>Definition: To be used when reporting loans that are modified, but <u>not</u> under a Federal Government Plan.</i>	CO	CO	CO	CO	CO
	Used by Child Support Agencies only when reporting delinquent or collection accounts (No actual comment displays)	-	-	-	CS	-
	Debt Extinguished Under State Law (Account Status Code should not be 13 or 61-65 and Current Balance and Amount Due = 0. Refer to Frequently Asked Question 69 for reporting guidelines.) <i>Definition: To be used when debts are extinguished under state law.</i>	DE	DE	DE	DE	DE
Refinanced	Account Closed Due to Refinance (Refer to Frequently Asked Question 42 for reporting guidelines.)	AS	AS	AS	-	-
Removal of Comment	Removes Any Previously Reported Special Comment Code, or no Special Comment applies for this reporting period	BLANK	BLANK	BLANK	BLANK	BLANK

(continued)

Exhibit 6

Special Comment Codes – By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Special Payment Arrangements	Account Payments Managed by Financial Counseling Program <i>Note: Used for external financial counseling programs</i>	B	B	B	B	B
	Paid by Co-Maker or Guarantor (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	C	C	C	C	C
	Debt Being Paid Through Insurance (Account Status Code should not be 13 or 61-65)	AB	AB	AB	AB	AB
	Paying Under a Partial Payment Agreement (Account Status Code should not be 13 or 61-65) <i>Definition: An agreed-upon repayment plan with account payments that are less than the original contract's account payments.</i>	AC	AC	AC	AC	AC
	Recalled to Active Military Duty <i>Definition: To be used for reservists; not to be used to identify full time military personnel.</i> <i>Note: A code is not available to report full time military personnel.</i>	AI	AI	AI	AI	AI
	Voluntarily Surrendered, then Redeemed or Reinstated	-	AO	-	-	AO

(continued)

Exhibit 6

Special Comment Codes - By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Special Payment Arrangements (continued)	Account Paid in Full for Less than the Full Balance (Requires Account Status Code 13 or 61-65 and Current Balance = 0. Refer to Frequently Asked Questions 38 and 53 for reporting guidelines.) <i>Definition: To be used when the furnisher accepts payment in full for less than the full balance. Includes short sales.</i>	AU	AU	AU	AU	AU
	Account Paid from Collateral (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	AX	AX	-	-	AX
	Paid by Company which Originally Sold the Merchandise (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	-	BN	-	-	-
	Paid through Insurance (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	BP	BP	BP	BP	BP
	Principal Deferred/Interest Payment Only	BT	BT	BT	-	BT
	Account in Forbearance (Account Status Code should not be 13 or 61-65 and Current Balance should not be zero.)	CP	CP	CP	CP	CP

(continued)

Exhibit 6

Special Comment Codes – By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Transferred	Account Closed Due to Transfer (Refer to Frequently Asked Question 46 for reporting guidelines.) <i>Note: Used for internal transfers</i>	AT	AT	AT	AT	AT
	Loan Assumed by Another Party (Requires ECOA Code T — Terminated. Refer to Frequently Asked Question 55 for reporting guidelines.)	-	H	H	-	-
	Account Transferred to Another Company/Service (Refer to Frequently Asked Question 46 for reporting guidelines.)	O	O	O	O	O
	Purchased by Another Company (Refer to Frequently Asked Question 47 for reporting guidelines.)	AH	AH	AH	AH	AH
	Account Acquired by FDIC/NCUA <i>Definition: Federal Deposit Insurance Corp./National Credit Union Administration</i>	AN	AN	AN	AN	AN
	Transferred to Recovery (Requires Account Status Code 71-97) <i>Note: Used for internal transfers</i>	BA	BA	BA	BA	BA

Note: Special Comment Codes AG (Simple Interest Loan) and AJ (Payroll Deduction) became obsolete for reporting as of September 2011. Special Comment Code AL (Student Loan Assigned to Government) became obsolete for reporting as of April 2020.

Exhibit 7

Special Comment Codes

The Special Comment Code (Field 19) must be reported each month as long as the condition applies.

If more than one Special Comment applies to an account, it is the data furnisher's decision to report the comment that is deemed most important from a business perspective for the current reporting period.

Code	Description
Blank	Removes any previously reported Special Comment Code, or no Special Comment applies for this reporting period.
B	Account payments managed by financial counseling program. <i>Note: Used for external financial counseling programs.</i>
C	Paid by Co-maker or Guarantor. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
H	Loan assumed by another party. <i>Requires ECOA Code T (Terminated).</i> <i>Refer to Frequently Asked Question 55 for reporting guidelines.</i>
I	Election of remedy. <i>Definition: A car or other item is repossessed, but the value is less than the balance due. The credit grantor must consider the account paid and cannot collect the difference in the amounts.</i>
M	Account closed at credit grantor's request. <i>Requires Date Closed to identify the date the account was closed to further purchases/use.</i>
O	Account transferred to another company/servicer. <i>Refer to Frequently Asked Question 46 for reporting guidelines.</i>
S	Special handling. Contact credit grantor for additional information.
V	Adjustment pending. <i>Definition: Account adjustment, such as returned merchandise and refund due.</i>
AB	Debt being paid through insurance. <i>Account Status Code should not be 13 or 61-65.</i>
AC	Paying under a partial payment agreement. <i>Account Status Code should not be 13 or 61-65.</i> <i>Definition: An agreed-upon repayment plan with account payments that are less than the original contract's account payments.</i>
AH	Purchased by another company. <i>Refer to Frequently Asked Question 47 for reporting guidelines.</i>

(continued)

Exhibit 7

Special Comment Codes

Code	Description
AI	Recalled to active military duty. <i>Definition: To be used for reservists; not to be used to identify full time military personnel.</i> <i>Note: A code is not available to report full time military personnel.</i>
AM	Account payments assured by wage garnishment.
AN	Account acquired by FDIC/NCUA. <i>Definition: Federal Deposit Insurance Corp./National Credit Union Administration.</i>
AO	Voluntarily surrendered - then redeemed or reinstated.
AP	Credit Line suspended. <i>Continue to report the last assigned Credit Limit. Account Status Code should not be 13 or 61-65. Does not require Date Closed to be reported since credit line is temporarily suspended.</i> <i>Definition: The credit line is temporarily unavailable for use.</i>
AS	Account closed due to refinance. <i>Refer to Frequently Asked Question 42 for reporting guidelines.</i>
AT	Account closed due to transfer. <i>Note: Used for internal transfers.</i> <i>Refer to Frequently Asked Question 46 for reporting guidelines.</i>
AU	Account paid in full for less than the full balance. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i> <i>Refer to Frequently Asked Questions 38 and 53 for reporting guidelines.</i> <i>Definition: To be used when the furnisher accepts payment in full for less than the full balance. Includes short sales.</i>
AV	First payment never received. <i>Comment: May indicate fraudulent activity.</i>
AW	Affected by natural or declared disaster. <i>Refer to Frequently Asked Question 58 for reporting guidelines.</i>
AX	Account paid from collateral. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
AZ	Redeemed or reinstated repossession.
BA	Transferred to Recovery. <i>Requires Account Status Code 71 - 97.</i> <i>Note: Used for internal transfers</i>

(continued)

Exhibit 7

Special Comment Codes

Code	Description
BB	Full termination/status pending. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BC	Full termination/obligation satisfied. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease), Account Status Code 13 and Current Balance = 0.</i>
BD	Full termination/balance owing. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BE	Early termination/status pending. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BF	Early termination/obligation satisfied. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease), Account Status Code 13 and Current Balance = 0.</i>
BG	Early termination/balance owing. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BH	Early termination/insurance loss. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BI	Involuntary repossession. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i> <i>Note: Accounts with non-lease type codes should be reported with Account Status 63 (Paid, was a repossession) or 96 (Repossession), as applicable.</i>
BJ	Involuntary repossession/obligation satisfied. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i> <i>Note: Accounts with non-lease type codes should be reported with Account Status 63 (Paid, was a repossession).</i>
BK	Involuntary repossession/balance owing. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i> <i>Note: Accounts with non-lease type codes should be reported with Account Status 96 (Repossession).</i>
BL	Credit card lost or stolen. <i>Refer to Frequently Asked Question 43 for reporting guidelines.</i>
BN	Paid by company which originally sold the merchandise. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>

(continued)

Exhibit 7

Special Comment Codes

Code	Description
BO	Foreclosure proceedings started. <i>Refer to Frequently Asked Question 52 for reporting guidelines.</i>
BP	Paid through insurance. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
BS	Prepaid lease. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease). Definition: Consumer paid lease in advance. No monthly payments are due. Refer to Frequently Asked Question 37 for reporting guidelines.</i>
BT	Principal deferred/Interest payment only.
CH	Guaranteed/Insured.
CI	Account closed due to inactivity. <i>Requires Date Closed to identify the date the account was closed to further purchases/use.</i>
CJ	Credit line no longer available – in repayment phase. <i>Continue to report the last assigned Credit Limit. Account Status Code should not be 13 or 61-65 and the Current Balance should not be zero. Requires Date Closed to identify the date the account was closed to further purchases/use. Definition: To be used for line of credit accounts that have two phases: the borrowing phase and the repayment phase. The repayment phase is a natural progression for the account when the consumer is responsible for payment of the outstanding balance and the credit line is no longer available for use.</i>
CK	Credit line reduced due to collateral depreciation. <i>Definition: To be used for Home Equity or other secured line of credit accounts.</i>
CL	Credit line suspended due to collateral depreciation. <i>Continue to report last assigned Credit Limit. Account Status Code should not be 13 or 61-65. Does not require Date Closed to be reported since credit line is temporarily suspended. Definition: To be used for Home Equity or other secured line of credit accounts when the credit line is temporarily unavailable for use.</i>
CM	Collateral released by creditor / Balance owing. <i>Account Status Code should not be 13 or 61-65 and the Current Balance should not be zero. Definition: To be used for Mortgages, Home Equity or other secured accounts when the collateral is released, but the consumer still has an outstanding balance to repay.</i>

(continued)

Exhibit 7

Special Comment Codes

Code	Description
CN	Loan modified under a federal government plan.
CO	Loan modified. <i>Definition: To be used when reporting loans that are modified, but <u>not</u> under a federal government plan.</i>
CP	Account in forbearance. <i>Account Status should not be 13 or 61-65 and the Current Balance should not be zero.</i>
CS	Used by Child Support Agencies only when reporting delinquent or collection accounts. (No actual comment displays.)
DE	Debt extinguished under state law. <i>Account Status should not be 13 or 61-65 and the Current Balance and Amount Past Due = 0. Refer to Frequently Asked Question 69 for reporting guidelines. Definition: To be used when debts are extinguished under state law.</i>

Notes: For comments specific to disputes and accounts closed at consumer's request, refer to the Compliance Condition Code (Field 20 and Exhibit 8).

Special Comment Codes AG (Simple Interest Loan) and AJ (Payroll Deduction) became obsolete for reporting as of September 2011. Special Comment Code AL (Student Loan Assigned to Government) became obsolete for reporting as of April 2020.

Exhibit 8

Compliance Condition Codes

The Compliance Condition Code (CCC), which is reported in Field 20 of the Base Segment, allows the reporting of a condition that is required for legal compliance.

Compliance Condition Codes are used to reflect accounts closed at consumer's request, and consumer disputes under the Fair Credit Billing Act (FCBA), the Fair Debt Collection Practices Act (FDCPA), or the direct dispute provisions of the Fair Credit Reporting Act (FCRA) and its implementing rules.

The Compliance Condition Codes should not be reported in response to a consumer dispute investigation request from the consumer reporting agencies, except where a data furnisher uses a Compliance Condition Code to satisfy its FDCPA obligation to communicate that a debt is disputed.

Report the following codes:

Code	Description
Blank	Retains previously reported code, or no new Compliance Condition Code applies for this reporting period
XA	Account closed at consumer's request <i>Definition: Reported when a consumer requested an account be closed.</i> Important Note: Report the Date Closed as the date the account was closed to further purchases.
XB	Account information has been disputed by the consumer directly to the data furnisher under the Fair Credit Reporting Act (FCRA); the data furnisher is conducting its investigation. <i>Definition: Reported when the completeness or accuracy of the account information is disputed directly to the data furnisher by the consumer under the FCRA and investigation of the dispute is in progress by the data furnisher.</i> <i>Code XB should be reported for FDCPA disputes.</i> Important Note: Code XB should no longer be reported after the investigation is completed; the XB should be removed by reporting the removal code or changed to another code.
XC	FCRA direct dispute investigation completed — consumer disagrees with the results of the data furnisher's investigation. <i>Definition: Reported when the investigation of an FCRA dispute made by the consumer directly to the data furnisher has been completed by the data furnisher; however, the consumer disagrees with the outcome of the investigation.</i>

(continued)

Exhibit 8

Compliance Condition Codes

Code	Description
XD	<p>Account closed at consumer's request; and account information disputed by the consumer directly to the data furnisher under the FCRA; the data furnisher is conducting its investigation.</p> <p><i>Definition: Combination code reported when two conditions (XA and XB) apply to the account. A consumer requested an account be closed and the completeness or accuracy of the account information is disputed directly to the data furnisher by the consumer under the FCRA and investigation of the dispute is in progress by the data furnisher.</i></p> <p>Important Notes: Report the Date Closed as the date the account was closed to further purchases.</p> <p>Code XD should no longer be reported after the investigation is completed; the XD should be changed to another code, such as XA or XE, if applicable.</p>
XE	<p>Account closed at consumer's request; and data furnisher has completed its investigation; consumer disagrees with the results of the investigation. (To be used for direct disputes under the FCRA or FCBA disputes)</p> <p><i>Definition: Combination code reported when two conditions (XA and XC or XG) apply to the account. A consumer requested an account be closed and the investigation of the dispute has been completed by the data furnisher; however, the consumer disagrees with the outcome of the investigation.</i></p> <p>Important Note: Report the Date Closed as the date the account was closed to further purchases.</p>
XF	<p>Account in dispute under Fair Credit Billing Act (FCBA); the data furnisher is conducting its investigation.</p> <p><i>Definition: Reported when information is disputed by the consumer under the FCBA and investigation of the dispute is in progress by the data furnisher.</i></p> <p>Important Note: Code XF should no longer be reported after the investigation is completed; the XF should be removed by reporting the removal code or changed to another code.</p>
XG	<p>FCBA dispute investigation completed — consumer disagrees with the results of the data furnisher's investigation.</p> <p><i>Definition: Reported when the investigation of an FCBA dispute has been completed by the data furnisher; however, the consumer disagrees with the outcome of the investigation.</i></p>

(continued)

Exhibit 8

Compliance Condition Codes

Code	Description
XH	<p>Account previously in dispute; the data furnisher has completed its investigation. (To be used for direct disputes under the FCRA, FDCPA disputes or FCBA disputes)</p> <p><i>Definition: Reported when the investigation of a dispute by the data furnisher was completed.</i></p>
XJ	<p>Account closed at consumer's request; and account information disputed by the consumer under FCBA; the data furnisher is conducting its investigation.</p> <p><i>Definition: Combination code reported when two conditions (XA and XF) apply to the account. A consumer requested an account be closed and information is disputed by the consumer under the FCBA and investigation of the dispute is in progress by the data furnisher.</i></p> <p>Important Notes: Report the Date Closed as the date the account was closed to further purchases.</p> <p>Code XJ should no longer be reported after the investigation is completed; the XJ should be changed to another code, such as XA or XE, if applicable.</p>
XR	<p>Removes the most recently reported Compliance Condition Code</p> <p>Important Note: Do not use XR as a default code. If no Compliance Condition Code applies in the current reporting period, blank fill this field.</p>

Important Note:

When a dispute investigation is completed, it is important to delete the previously-reported Compliance Condition Code or to update the Compliance Condition Code to show that the investigation has been completed. Your internal policies and procedures should indicate which option your company prefers to use; and if you choose to report a code indicating that the investigation has been completed, how long to retain the code on the consumer's file.

(continued)

Exhibit 8

Compliance Condition Codes

The code should be reported each month as long as the condition applies.

Date of Account Information	CCC	Action
09/15/2019	XA	XA is added to file.
10/15/2019	XA	XA is retained.
11/15/2019	XA	XA is retained.
12/15/2019	Blank	XA is retained.
01/15/2020	XD	XA is replaced with XD.
02/15/2020	XD	XD is retained.
03/15/2020	XA	XD is replaced with XA.

As an option, the code should be reported one time and will be deleted only when another Compliance Condition Code or the **XR** (Removal code) is reported. Example:

Date of Account Information	CCC	Action
09/15/2019	XA	XA is added to file.
10/15/2019	Blank	XA is retained.
11/15/2019	Blank	XA is retained.
12/15/2019	Blank	XA is retained.
01/15/2020	XD	XA is replaced with XD.
02/15/2020	Blank	XD is retained.
03/15/2020	XA	XD is replaced with XA.

Note: Regardless of the method of reporting, the code will be deleted *only* when another Compliance Condition Code or the XR (Removal code) is reported.

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency

PURPOSE: This date will be used by the consumer reporting agencies to determine when delinquent data is to be deleted, pursuant to the Fair Credit Reporting Act (FCRA).

HOW TO REPORT: The date in the Date of First Delinquency field must be determined each reporting period based on the following hierarchy:

1. For Account Status Codes 61-65, 71, 78, 80, 82-84, 88-89 and 93-97, report the date of the first 30-day delinquency that led to the status being reported. This date should be 30 days after the due date. If a delinquent account becomes current, the Date of First Delinquency should be zero filled. Then if the account goes delinquent again, the Date of First Delinquency starts over with the new first delinquency date.
2. For Account Status Codes 05 and 13, if the Payment Rating is 1-6, G or L, report the date of the first 30-day delinquency that led to the Payment Rating being reported. This date should be 30 days after the due date.
3. For Consumer Information Indicators A-H and Z (Bankruptcies), 1A (Personal Receivership) and V-Y (Reaffirmation of Debt Rescinded with Bankruptcy Chapters), if the account is current (Account Status Code 11 or Account Status Code 05 or 13 with Payment Rating 0), report the date of the bankruptcy/personal receivership petition or notification. Even though the account is not delinquent, this date is required for purging purposes.

Note: Consumer Information Indicators W, X and Y are obsolete as of September 2010 and may no longer be reported.

If none of the conditions listed in the above hierarchy apply, the Date of First Delinquency should be zero filled.

The following pages contain a flowchart view of the Date of First Delinquency hierarchy, plus several step-by-step examples demonstrating how to report the FCRA Compliance/Date of First Delinquency.

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

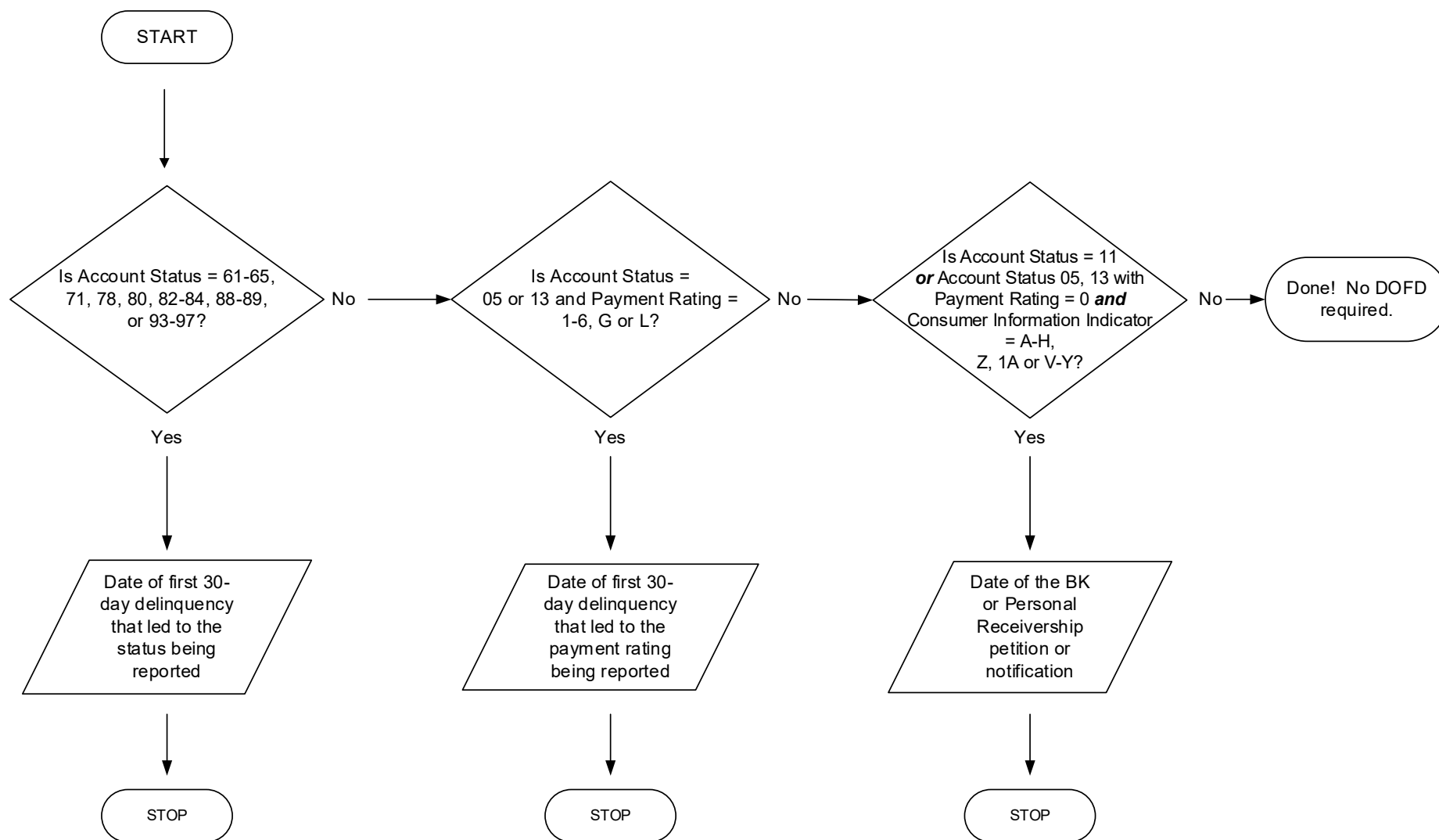


Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Example 1: Displays an account that goes delinquent to current and then goes delinquent again.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
03/12/2020	03/20/2020	0	11 Current Account 0-29 days past the due date	Zero fill
04/12/2020	03/20/2020	23	11 Current Account 0-29 days past the due date	Zero fill
05/12/2020	03/20/2020	53	71 30-59 days past the due date	04/19/2020 (First Delinquency)
06/12/2020	03/20/2020	84	78 60-89 days past the due date	04/19/2020
07/12/2020	06/20/2020	22	11 Current Account 0-29 days past the due date	Zero fill
08/12/2020	06/20/2020	53	71 30-59 days past the due date	07/20/2020 (First Delinquency)
09/12/2020	06/20/2020	84	78 60-89 days past the due date	07/20/2020
10/12/2020	06/20/2020	114	80 90-119 days past the due date	07/20/2020
11/12/2020	06/20/2020	145	93 (Collection)	07/20/2020

Note: The Date of First Delinquency is used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Example 2: Displays an account that goes delinquent and never returns to a current status.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
02/29/2020	03/01/2020	0	11 Current Account 0-29 days past the due date	Zero fill
03/31/2020	03/01/2020	30	71 30-59 days past the due date	03/31/2020 (First Delinquency)
04/30/2020	03/01/2020	60	78 60-89 days past the due date	03/31/2020
05/31/2020	03/01/2020	91	80 90-119 days past the due date	03/31/2020
06/30/2020	03/01/2020	121	82 120-149 days past the due date	03/31/2020
07/31/2020	03/01/2020	152	83 150-179 days past the due date	03/31/2020
08/31/2020	03/01/2020	183	97 Charge-off	03/31/2020
09/30/2020	All payments made	N/A	64 Paid Charge-off	03/31/2020

Note: The Date of First Delinquency is used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Example 3: Displays an account that has rolling delinquencies.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
04/12/2020	03/20/2020	23	11 Current Account 0-29 days past the due date	Zero fill
05/12/2020	03/20/2020	53	71 30-59 days past the due date	04/19/2020 (First delinquency)
06/12/2020	04/20/2020	53	71 30-59 days past the due date	04/19/2020
07/12/2020	04/20/2020	83	78 60-89 days past the due date	04/19/2020
08/12/2020	04/20/2020	114	80 90-119 days past the due date	04/19/2020
09/12/2020	07/20/2020	54	71 30-59 days past the due date	04/19/2020
10/12/2020	08/20/2020	53	71 30-59 days past the due date	04/19/2020
11/12/2020	08/20/2020	84	78 60-89 days past the due date	04/19/2020

Note: The Date of First Delinquency is used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Example 4: Displays an account that has been paid; the Payment Rating is delinquent.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
03/18/2020	03/15/2020	3	11 Current Account 0-29 days past the due date	Zero fill
04/18/2020	04/15/2020	3	11 Current Account 0-29 days past the due date	Zero fill
05/18/2020	04/15/2020	33	71 30-59 days past the due date	05/15/2020 (First Delinquency)
06/18/2020	04/15/2020	64	78 60-89 days past the due date	05/15/2020
07/18/2020	05/15/2020	64	78 60-89 days past the due date	05/15/2020
08/18/2020	05/15/2020	95	80 90-119 days past the due date	05/15/2020
09/18/2020	05/15/2020	126	82 120-149 days past the due date	05/15/2020
10/15/2020	05/15/2020 Paid in full on 10/15/2020	153 prior to being paid in full	13 Paid Account Payment Rating = 5 150-179 days past the due date	05/15/2020

Note: The Date of First Delinquency is used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Example 5: Displays an account that was current when included in a Chapter 7 Bankruptcy. Data furnisher only reports Consumer Information Indicator one time to take effect.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definitions (Field 17A)	Date of First Delinquency (Field 25)
03/18/2020	03/15/2020	3	11 Current	Zero fill
04/18/2020	04/15/2020	3	11 Current	Zero fill
05/18/2020	05/15/2020	3	11 Current Consumer Information Indicator = A Petition for Chapter 7 Bankruptcy	05/07/2020 (Bankruptcy Petition Date)
06/18/2020	06/15/2020	3	11 Current Consumer Information Indicator = Blank	Zero fill

Note: The Date of First Delinquency is used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Example 6: Displays an account that was current when included in a Chapter 7 Bankruptcy. Data furnisher reports Consumer Information Indicator every month as long as it applies.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definitions (Field 17A)	Date of First Delinquency (Field 25)
03/18/2020	03/15/2020	3	11 Current	Zero fill
04/18/2020	04/15/2020	3	11 Current	Zero fill
05/18/2020	05/15/2020	3	11 Current Consumer Information Indicator = A Petition for Chapter 7 Bankruptcy	05/07/2020 (Bankruptcy Petition Date)
06/18/2020	06/15/2020	3	11 Current Consumer Information Indicator = A Petition for Chapter 7 Bankruptcy	05/07/2020 (Bankruptcy Petition Date)

Note: The Date of First Delinquency is used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Example 7: Displays an account that was delinquent before it was included in a Chapter 7 Bankruptcy.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
03/18/2020	03/15/2020	3	11 Current 0-29 days past the due date	Zero fill
04/18/2020	04/15/2020	3	11 Current 0-29 days past the due date	Zero fill
05/18/2020	04/15/2020	33	71 30-59 days past the due date	05/15/2020 (First Delinquency)
06/18/2020	04/15/2020	64	78 60-89 days past the due date	05/15/2020
07/18/2020	05/15/2020	64	78 60-89 days past the due date	05/15/2020
08/18/2020	05/15/2020	95	80 90-119 days past the due date Consumer Information Indicator = A Petition for Chapter 7 Bankruptcy	05/15/2020

Note: The Date of First Delinquency is used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Example 8: Displays an account in a Chapter 7 Bankruptcy that is current at the time of filing and the non-filer becomes delinquent after the petition is reported. Data furnisher reports Consumer Information Indicator every month as long as it applies.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definition (Field 17A)	Date of First Delinquency (Field 25)
03/18/2020	03/15/2020	3	11 Current 0-29 days past the due date	Zero fill
04/18/2020	04/15/2020	3	11 Current Consumer Information Indicator = A (Filer) Petition for Chapter 7 Bankruptcy Consumer Information Indicator = Blank (Non-filer)	04/10/2020 (Bankruptcy Notification Date – for the Filer only) Hierarchy Rule #3
05/18/2020	05/15/2020	3	11 Current Consumer Information Indicator = A (Filer) Petition for Chapter 7 Bankruptcy Consumer Information Indicator = Blank (Non-filer)	04/10/2020 (Bankruptcy Notification Date – for the Filer only) Hierarchy Rule #3
06/18/2020	05/15/2020	34	71 30-59 days past the due date Consumer Information Indicator = A (Filer) Petition for Chapter 7 Bankruptcy Consumer Information Indicator = Blank (Non-filer)	06/14/2020 (For the Non-filer only) Hierarchy Rule #1
07/18/2020	05/15/2020	64	78 60-89 days past the due date Consumer Information Indicator = A (Filer) Petition for Chapter 7 Bankruptcy Consumer Information Indicator = Blank (Non-filer)	06/14/2020 (For the Non-filer only) Hierarchy Rule #1

Note: The Date of First Delinquency is used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Fair Credit Reporting Act Excerpts

FCRA Section 605(c) [15 U.S.C. § 1681c(c)], Running of Reporting Period:

(1) In general: The 7-year period referred to in paragraphs (4) and (6) of subsection (a) shall begin, with respect to any delinquent account that is placed for collection (internally or by referral to a third party, whichever is earlier), charged to profit and loss, or subjected to any similar action, upon the expiration of the 180-day period beginning on the date of the commencement of the delinquency which immediately preceded the collection activity, charge to profit and loss, or similar action.

FCRA Section 605(a) [15 U.S.C. § 1681c(a)], Information Excluded From Consumer Reports:

(4) Accounts placed for collection or charged to profit and loss which antedate the report by more than seven years.

(5) Any other adverse item of information, other than records of convictions or crimes which antedates the report by more than seven years.

(continued)

Exhibit 9

Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

Fair Credit Reporting Act Excerpts

FCRA Section 623 [15 U.S.C. § 1681s-2], Responsibilities of Furnishers of Information to Consumer Reporting Agencies:

(5) Duty to provide notice of delinquency of accounts.

(A) In general. - A person who furnishes information to a consumer reporting agency regarding a delinquent account being placed for collection, charged to profit or loss, or subjected to any similar action, shall, not later than 90 days after furnishing the information, notify the agency of the date of delinquency on the account, which shall be the month and year of the commencement of the delinquency on the account that immediately preceded the action.

(B) Rule of construction.-For purposes of this paragraph only, and provided that the consumer does not dispute the information, a person that furnishes information on a delinquent account that is placed for collection, charged for profit or loss, or subjected to any similar action, complies with this paragraph, if-

(i) the person reports the same date of delinquency as that provided by the creditor to which the account was owed at the time at which the commencement of the delinquency occurred, if the creditor previously reported that date of delinquency to a consumer reporting agency;

(ii) the creditor did not previously report the date of delinquency to a consumer reporting agency, and the person establishes and follows reasonable procedures to obtain the date of delinquency from the creditor or another reliable source and reports that date to a consumer reporting agency as the date of delinquency; or

(iii) the creditor did not previously report the date of delinquency to a consumer reporting agency and the date of delinquency cannot be reasonably obtained as provided in clause (ii), the person establishes and follows reasonable procedures to ensure the date reported as the date of delinquency precedes the date on which the account is placed for collection, charged to profit or loss, or subjected to any similar action, and reports such date to the credit reporting agency.

Exhibit 10

ECOA Codes

The ECOA Code defines the relationship of the consumer to the account in compliance with the Equal Credit Opportunity Act. This code is reported in Field 37 of the Base Segment and Field 10 of the J1 and J2 Segments. Values available:

Code	Description	Definition	Logical Usage
1	Individual	This consumer has contractual responsibility for this account and is primarily responsible for its payment.	<ul style="list-style-type: none">• Most commonly reported in Base Segment• May be reported in J1 or J2 Segment when Base Segment consumer is reported with T, X or Z
2	Joint Contractual Liability	This consumer has contractual responsibility for this joint account.	<ul style="list-style-type: none">• Base, J1 or J2 Segment
3	Authorized User	<p>This consumer is an authorized user of this account; another consumer has contractual responsibility.</p> <p>Note: The full Date of Birth (MMDDYYYY) must be reported for all newly-added authorized users on all pre-existing and newly-opened accounts.</p>	<ul style="list-style-type: none">• J1 or J2 Segment
5	Co-maker or Guarantor	This consumer is the co-maker or guarantor for this account, who becomes liable if the maker defaults.	<ul style="list-style-type: none">• J1 or J2 Segment• May be reported in Base Segment when business is reported in J2 Segment
7	Maker	This consumer is the maker who is liable for the account, but a co-maker or guarantor is liable if the maker defaults.	<ul style="list-style-type: none">• Most commonly reported in Base Segment• May be reported in J1 or J2 Segment if more than one maker on account

(continued)

Exhibit 10

ECOA Codes

Code	Description	Definition	Logical Usage
T	Terminated	The association with the account has been terminated by this consumer. Note: Refer to Frequently Asked Question 14(b) for usage guidelines on ECOA Code T.	<ul style="list-style-type: none">• Base, J1 or J2 Segment
X	Deceased	This consumer is deceased. Note: Do not report ECOA Code X until you have received a legally-sufficient death notice; e.g., death certificate. Data furnishers should consult with internal Legal counsel or Compliance area regarding what constitutes a legally-sufficient death notice.	<ul style="list-style-type: none">• Base, J1 or J2 Segment
W	Business/ Commercial	This code is used to identify that the company reported in the Name field is contractually liable for this account. Note: Refer to Frequently Asked Question 20 for guidelines on reporting consumers who are personally liable for business accounts.	<ul style="list-style-type: none">• J2 Segment
Z	Delete Consumer	This code is used to delete this consumer from the account. Notes: Refer to Frequently Asked Question 14(b) for usage guidelines on ECOA Code Z. Only inaccurately reported consumers should be deleted. Additionally, as per Frequently Asked Questions & Answers 27 and 28, authorized users should be deleted from accounts included in bankruptcy since authorized users are not contractually responsible for payments.	<ul style="list-style-type: none">• Base, J1 or J2 Segment

Note: ECOA Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.

Exhibit 11

Consumer Information Indicators

The Consumer Information Indicator (CII), which is reported in Field 38 of the Base Segment, Field 11 of the J1 Segment, and Field 11 of the J2 Segment, contains a value that indicates a special condition that applies to the specific consumer. The Consumer Information Indicator must be reported only on the consumer to whom the information applies. Report the following values:

Code	Description
BLANK	Retains previously reported value, or no new Consumer Information Indicator applies for this reporting period
A	Petition for Chapter 7 Bankruptcy
B	Petition for Chapter 11 Bankruptcy
C	Petition for Chapter 12 Bankruptcy
D	Petition for Chapter 13 Bankruptcy
E	Discharged through Bankruptcy Chapter 7
F	Discharged through Bankruptcy Chapter 11
G	Discharged through Bankruptcy Chapter 12
H	Discharged/Completed through Bankruptcy Chapter 13
I ¹	Chapter 7 Bankruptcy Dismissed
J ¹	Chapter 11 Bankruptcy Dismissed
K ¹	Chapter 12 Bankruptcy Dismissed
L ¹	Chapter 13 Bankruptcy Dismissed
M ¹	Chapter 7 Bankruptcy Withdrawn
N ¹	Chapter 11 Bankruptcy Withdrawn
O ¹	Chapter 12 Bankruptcy Withdrawn
P ¹	Chapter 13 Bankruptcy Withdrawn
Z ¹	Bankruptcy – Undesignated Chapter Note: Report indicators with specific bankruptcy chapters, when known.
1A	Personal Receivership
Q	Removes previously reported Bankruptcy Indicator (A through P and Z) or Personal Receivership Indicator (1A). Also used to report Bankruptcies that have been closed or terminated without being discharged or dismissed. Note: Do not report Q as a default value. If no new CII applies in the current reporting period, blank fill this field.

(continued)

¹ Code will become obsolete for reporting as of April 2021.

Exhibit 11

Consumer Information Indicators

Code	Description
R	Chapter 7 Reaffirmation of Debt
V	Chapter 7 Reaffirmation of Debt Rescinded
2A	Lease Assumption
S	Removes previously reported Reaffirmation of Debt, Reaffirmation of Debt Rescinded and Lease Assumption Indicators (R, V, 2A, and Obsolete values W, X, Y) Note: Do not report S as a default value. If no new CII applies in the current reporting period, blank fill this field.
T	Credit Grantor Cannot Locate Consumer
U	Consumer Now Located (Removes previously reported T Indicator) Note: Do not report U as a default value. If no new CII applies in the current reporting period, blank fill this field.

Note: Codes W (Chapter 11 Reaffirmation of Debt Rescinded), X (Chapter 12 Reaffirmation of Debt Rescinded) and Y (Chapter 13 Reaffirmation of Debt Rescinded) are obsolete as of September 2010 and may no longer be reported.

Codes I – P (Bankruptcy Dismissed and Withdrawn for Chapters 7, 11, 12 and 13) and Z (Bankruptcy - Undesignated Chapter) will become obsolete for reporting as of April 2021.

(continued)

Exhibit 11

Consumer Information Indicators

Examples of reporting Consumer Information Indicators:

The Consumer Information Indicator should be reported each month as long as the condition applies.

Date of Account Information	CII	Action
11/15/2019	A	A is added to file.
12/15/2019	A	A is retained.
01/15/2020	A	A is retained.
02/15/2020	E	A is replaced by E.
03/15/2020	E	E is retained.
04/15/2020	Blank	E is retained.

As an option, the indicator should be reported one time and will be deleted only when another Consumer Information Indicator or a Removal value is reported.

Date of Account Information	CII	Action
11/15/2019	A	A is added to file.
12/15/2019	Blank	A is retained.
01/15/2020	Blank	A is retained.
02/15/2020	E	A is replaced by E.
03/15/2020	Blank	E is retained.

Regardless of the method of reporting (each month or one time), the Consumer Information Indicator will be deleted only when another Consumer Information Indicator or a Removal value is reported.

Date of Account Information	CII	Action
11/15/2019	D	D is added to file.
12/15/2019	D	D is retained.
01/15/2020	D	D is retained.
02/15/2020	D	D is retained.
03/15/2020	Q	D is removed.

Note: The removal value **Q** is used to remove the **D**, which in this example, was reported in error.

Exhibit 12

Country Codes

These Country Codes, which are unique to Metro 2®, are used for credit reporting purposes and may differ from codes used by other industries.

<u>COUNTRY</u>	<u>CODE</u>	<u>COUNTRY</u>	<u>CODE</u>	<u>COUNTRY</u>	<u>CODE</u>
Afghanistan	AF	Cayman Islands	CI	Gibraltar	GI
Albania	AN	Central African		Grenada	GD
Algeria	DZ	Republic	CF	Greece	GR
Andorra	AD	Chad	CD	Greenland	GE
Angola	AO	Chile	CL	Guadeloupe	GP
Anguilla	AI	China (Peking)	CP	Guatemala	GT
Antigua & Barbuda	AG	Colombia	CB	Guernsey	GG
Argentina	AT	Comoros	CJ	Guinea	GN
Armenia	RM	Congo	CG	Guinea-Bissau	GW
Aruba	AW	Corsica	CC	Guyana	GY
Ascension	AS	Costa Rica	CR	Haiti	HA
Australia	AU	Croatia	HX	Honduras	HN
Austria	DF	Cuba	HR	Hungary	HU
Azerbaijan	AJ	Cyprus	CY	Iceland	IS
Azores	AX	Czech Republic	CZ	India	IB
Bahamas	BS	Democratic Republic		Indonesia	IF
Bahrain	BH	of Congo	ZR	Iran	IR
Bangladesh	BD	Denmark	DK	Iraq	IQ
Barbados	BB	Djibouti	DJ	Ireland	IE
Belarus	BL	Dominica	DM	Israel	IG
Belgium	BE	Dominican		Italy	IT
Belize	BZ	Republic	DO	Ivory Coast	IC
Benin	BJ	East Timor	EM	Jamaica	JM
Bermuda	BU	Ecuador	EC	Japan	JP
Bhutan	BM	Egypt	EG	Jersey	JE
Bolivia	BO	El Salvador	SV	Jordan	JO
Bosnia &		Equatorial Guinea	GQ	Kazakhstan	KZ
Herzegovina	BX	Eritrea	ER	Kenya	KE
Botswana	BW	Estonia	SU	Kiribati	KI
Brazil	BR	Ethiopia	ET	Korea (North)	KX
British Virgin		Falkland Islands	FA	Korea (South)	KR
Islands	VG	Faroe Islands	FE	Kuwait	KW
Brunei	BN	Fiji	FJ	Kyrgyzstan	KG
Bulgaria	BG	Finland	FI	Laos	LO
Burkina Faso	BF	France	FR	Latvia	LX
Burundi	BI	French Guiana	GF	Lebanon	LB
Cambodia	KA	French Polynesia	FP		
Cameroon	CM	Gabon	GB	(continued)	
Canada	CN	Gambia	GM		
Cape Verde	CV	Germany	DW		
Carriacou	CU	Ghana	GH		

Exhibit 12

Country Codes

<u>COUNTRY</u>	<u>CODE</u>	<u>COUNTRY</u>	<u>CODE</u>	<u>COUNTRY</u>	<u>CODE</u>
Leeward Islands	LE	Paraguay	PY	Taiwan	TW
Lesotho	LS	Peru	PU	Tanzania	TZ
Liberia	LR	Philippines	PH	Thailand	TH
Libya	LV	Pitcairn Islands	PS	Togo	TG
Liechtenstein	CH	Poland	PL	Tonga	TA
Lithuania	LT	Portugal	PT	Trinidad & Tobago	TT
Luxembourg	LU	Qatar	QA	Tristan da Cunha	TD
Macao	MJ	Republic of Georgia	GX	Tunisia	TU
Macedonia	MH	Reunion Island	RE	Turkey	TR
Madagascar	MG	Romania	RO	Turkmenistan	TM
Madeira	MB	Russia	RU	Turks & Caicos Islands	TC
Malawi	MW	Rwanda	RW	Tuvalu	TV
Malaysia	MY	Saint Helena	SH	Uganda	UG
Maldives	MV	Saint Kitts & Nevis	KN	Ukraine	UA
Mali	ML	Saint Lucia	LC	Union of Myanmar (Burma)	BK
Malta	MF	Saint Pierre & Miquelon	SP	United Arab Emirates	UM
Martinique	MQ	Saint Vincent & the Grenadines	SF	United Kingdom	UK
Mauritania	MR	San Marino	SM	United States	US
Mauritius	MU	Santa Cruz Islands	ST	Uruguay	UY
Mexico	MX	Sao Tome & Principe	MP	Uzbekistan	UZ
Moldova	LD	Saudi Arabia	SA	Vanuatu	VU
Monaco	AC	Senegal	SN	Vatican City State	VC
Mongolia	MC	Serbia	SX	Venezuela	VE
Montenegro	MM	Seychelles	YC	Vietnam	VN
Montserrat	MK	Sierra Leone	SL	Wallis/Futuna Island	WT
Morocco	RC	Singapore	SG	Western Samoa	WS
Mozambique	MZ	Slovakia	VK	Yemen	YE
Namibia	NB	Slovenia	XN	Zambia	ZM
Nauru	NA	Solomon Islands	SI	Zimbabwe	ZW
Nepal	NP	Somalia	SO		
Netherlands		South Africa	ZA		
Antilles	NN	Spain	ES		
Netherlands	NL	Sri Lanka	LK		
New Caledonia	NW	Sudan	SB		
New Zealand	NZ	Suriname	SR		
Nicaragua	NI	Swaziland	SZ		
Niger	NR	Sweden	SE		
Nigeria	NG	Switzerland	SW		
Norway	NO	Syria	SY		
Oman	OM	Tajikistan	TK		
Pakistan	PK				
Panama	PM				
Papua New Guinea	PG				

Exhibit 13

General Rules for Addresses

Most addresses consist of a street address, containing a street number, street name, street type, city name (spelled out), state code and postal/zip code. Include the complete address on all records; the absence of an address may cause a record to be bypassed.

Do not report non-address information in the Address fields.

Examples: Do not report a spouse name in the Address field.
 Do not report account description terminology, such as Fraud, Bankrupt, Charge-off, etc. in the Address field.

Slashes, dashes and periods are acceptable in the First Line of Address, Second Line of Address and City fields.

Use the standard postal abbreviations for state names, such as MS for Mississippi. Refer to Exhibit 14 for a complete list of State Codes.

Notes: If the consumer has a U.S. address and a foreign address, report the U.S. address. If the consumer has never used the U.S. address as a billing/ mailing address (e.g., a property address), report the foreign address.

The Address Indicator (Field 45 in the Base Segment and Field 18 in the J2 Segment) should be used to designate what address is being reported.

Military Addresses

The standard format for Military Addresses (APO/FPO Addresses) is:

PSC (CMR or UNIT) NNNNN
BOX NNNN or SHIP'S NAME
CITY (APO/FPO), STATE (AE, AP OR AA), ZIP CODE

Currently, the largest unit number is 5 digits long.

The U.S. Postal Service designates the state code for military addresses as follows:

- AE – Armed Forces in Europe, Africa, Middle East and Canada
- AA – Armed Forces in the Americas, excluding Canada
- AP – Armed Forces in the Pacific

All domestic military mail must have the conventional street style addresses.

Exhibit 14

State Codes

STATE	CODE	STATE	CODE
Alabama	AL	New Jersey	NJ
Alaska	AK	New Mexico	NM
American Samoa	AS	New York	NY
Arizona	AZ	North Carolina	NC
Arkansas	AR	North Dakota	ND
California	CA	Northern Mariana Islands	MP
Colorado	CO	Ohio	OH
Connecticut	CT	Oklahoma	OK
Delaware	DE	Oregon	OR
District of Columbia	DC	Palau	PW
Federated States of Micronesia	FM	Pennsylvania	PA
Florida	FL	Puerto Rico	PR
Georgia	GA	Rhode Island	RI
Guam	GU	South Carolina	SC
Hawaii	HI	South Dakota	SD
Idaho	ID	Tennessee	TN
Illinois	IL	Texas	TX
Indiana	IN	Utah	UT
Iowa	IA	Vermont	VT
Kansas	KS	Virginia	VA
Kentucky	KY	Virgin Islands	VI
Louisiana	LA	Washington	WA
Maine	ME	West Virginia	WV
Marshall Islands	MH	Wisconsin	WI
Maryland	MD	Wyoming	WY
Massachusetts	MA		
Michigan	MI	Military in the Americas other than Canada	AA
Minnesota	MN		
Mississippi	MS		
Missouri	MO	Military in Europe, Middle East, Africa, Canada	AE
Montana	MT		
Nebraska	NE		
Nevada	NV	Military in the Pacific Theater	AP
New Hampshire	NH		

Exhibit 15

Data Conversion Checklist

The purpose of the Data Conversion Checklist is to guide data furnishers through one of the following processes by focusing on the critical steps and questions that must be answered.

- Change to a new data processor
- Core system change or conversion (internal in-house system)
- Mergers & Acquisitions
- Coordination of reporting between seller & purchaser of accounts

If your conversion involves another data furnisher, consult with the other furnisher throughout the project regarding information reported in their Metro 2® program.

Data furnishers should contact your data representatives at the consumer reporting agencies early in the process to facilitate a smooth conversion.

Note:

- **External Data Furnisher = Data reported by 3rd Party Data Processor**
- **Internal Data Furnisher = Data reported directly by in-house system**

STEP	TASK DESCRIPTION	CRRG® REFERENCE	ANSWERS/COMMENTS
1	Conversion Questions		
	Identify external or internal data furnisher involved.		
	Will new external or internal data furnisher send the data file to same CRAs to which my current processor sends data?		
	Will all portfolios be transferring? If answer is no, which ones will be transferring?		
	Will all accounts be transferring; specifically will paid, transferred and derogatory accounts be transferring?		
	What is the expected date of conversion?		
	What is the approximate number of accounts that are transferring?		

(continued)

Exhibit 15

Data Conversion Checklist

STEP	TASK DESCRIPTION	CRRG® REFERENCE	ANSWERS/COMMENTS
	What Identification Number is currently reported?	Page 4-5	
	What is the Identification Number used by new external or internal data furnisher?	Page 4-5	
	Will format of the account numbers change? If so, provide specifics (e.g.; append or prepend any digits/characters to the Account Number).	Page 4-5	
	If Identification Number or Account Number is changing, will the L1 Change Segment be reported?	Pages 4-43 & 4-44; See FAQ 5	
	Will the Portfolio Types remain the same?	Page 4-6	
	Will the Account Types remain the same?	Page 4-6; See Exhibits 1 & 2	
	Will the Dates Opened remain the same?	Page 4-6	
	Will the Credit Limits remain the same?	Page 4-7	
	Will the Highest Credit or Original Loan Amounts remain the same?	Page 4-7	

(continued)

Exhibit 15

Data Conversion Checklist

STEP	TASK DESCRIPTION	CRRG® REFERENCE	ANSWERS/COMMENTS
	Will new external or internal data furnisher report the Payment History Profile (up to 24 months)?	Page 4-11; See FAQ 22 and Exhibit 5	
	Will previously-reported history be included with the first submission or will payment history only be reported going forward?	Page 4-11; See FAQ 22 and Exhibit 5	
	Ensure that the FCRA Compliance/Date of First Delinquency is accurate & consistent with prior reporting.	See FAQ 22 and Exhibit 9	
2	<i>Contact your data rep at each CRA in advance to notify them about the conversion.</i>		
	Provide to the CRAs the technical contact's email address & phone number for new external or internal data furnisher.		
	Provide this checklist with answers to your data representative at each CRA.		

Examples of Record Layouts – Hexadecimal Representation

For each format, there is an example of the Header Record, the Data Record (Base Segment and J1 through N1 Segments) and the Trailer Record. The 366 packed format is shown as variable-length. The 426 unpacked format is shown as fixed-length.

Note: The Block Descriptor Word shifts the first record of each block over 4 positions.

```

POS.    1-   4 = Block Descriptor Word
POS.    5-   8 = Record Descriptor Word
POS.    9-  14 = Record Identifier
POS.   15-  16 = Cycle Identifier
POS.   17-  26 = Innovis Program ID
POS.   27-  36 = Equifax Program ID
POS.   37-  41 = Experian Program ID
POS.   42-  51 = TransUnion Program ID
POS.   52-  59 = Activity Date
POS.   60-  67 = Date Created
POS.   68-  75 = Program Date
POS.   76-  83 = Program Revision Date
POS.   84-123 = Reporter Name
POS.  124-219 = Reporter Address
POS.  220-229 = Reporter Phone #
POS.  230-269 = Software Vendor Name
POS.  270-274 = Software Version #
POS.  275-284 = MicroBilt/PRBC Program ID
POS.  285-370 = Reserved

```

CREDIT REPORTING RESOURCE GUIDE®
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366 FORMAT - DATA RECORD (VARIABLE BLOCKED)

```
CHAR      -      * ID NUMBER      01ACCOUNT NUMBER      R18      REV
ZONE 0B000B00F062994754CC4DEDCCD4444444444FFCCCEDE4DEDCCD4444444444444444DFF054980000000070DC400000000
NUMR 4800440000019100C09405442590000000000001133645305442590000000000000009180019C0010C0005C95500005C000
01...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR 1102200000BBBBBBBBBBBBBBBBBBB SURNAME
ZONE 10FFFFFFFFFCCCCCCCCCCCCCCCC4444000200000000000011990000000000011994444444444444444EEDDCDC4444444
NUMR 0C1102200000222222222222222200000000C0000C0000C0019C0000C0000C0019C00000000000000024951450000000
101...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR 1ST NAME MIDDLE NAME 2 <2 US1ST LINE OF ADDRESS
ZONE 4444444444FEE4DCDC4444444444444444DCDCDC4DCDC4444444444F1357901199095524F44EEFEE4DCDC4DC4CCDCCEE4444444
NUMR 0000000000012305145000000000000049443505145000000000022468C0014C99513C200421230395506601449522000000000
201...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR 2ND LINE OF ADDRESS CITY ST123451234Y J1 SURNAME 1S
ZONE 44444FDC4DCDC4DC4CCDCCEE444444444444444444444444444444444444444444444444FE
NUMR 000002540395506601449522000000000000039380000000000000000231234512348011024951450000000000000000012
301...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR T NAME MIDDLE NAME 123456789MDDYYYYY99955512342 J2 SURNAME 1S
ZONE E4DCDC44444444444444DCDCDC44444444444444444444444444444444444444444444444FE
NUMR 3051450000000000000494435051450000000001234567894444888899955512342000120249514500000000000000000012
401...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR T NAME MIDDLE NAME 123456789MDDYYYYY99955512342 US1ST LINE OF ADDRESS
ZONE E4DCDC44444444444444DCDCDC4DCDC44444444444444444444444444444444444444444444FE
NUMR 3051450000000000000494435051450000000001234567894444888899955512342004212303955066014495220000000000
501...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR 2ND LINE OF ADDRESS CITY ST123451234 J2 SURNAME 1S
ZONE 444FDC4DCDC4DC4CCDCCEE444444444444444444444444444444444444444444444444FE
NUMR 0002540395506601449522000000000000039380000000000000000231234512340000120249514500000000000000000012
601...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR T NAME MIDDLE NAME 123456789MDDYYYYY99955512342 US1ST LINE OF ADDRESS
ZONE E4DCDC44444444444444DCDCDC4DCDC44444444444444444444444444444444444444444444FE
NUMR 3051450000000000000494435051450000000001234567894444888899955512342004212303955066014495220000000000
701...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR LINE OF ADDRESS 2 CITY ST123451234 K1ORIGINAL CREDITOR NAME
ZONE 444DCDC4DC4CCDCCEE4F4444444444444444444444444444444444444444444444444444444FE
NUMR 00039550660144952200000000000000039380000000000000000231234512340000216997951303954936905145000000
801...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR 00K20PURCHASED PORFOLIO/SOLD NAME K300ACCOUNT NUMBER MORT ID NUMBER K400MDDYYYYYMMDDYYYYY00
ZONE 44FFDFDEDCCECC4DDDDDDDC6EDDC4DCDC444DFFCCCEDE4DEDCCD4444DDDE4CC4DEDCCD4444DFFDDCCEEEEDDCCEEEEFF
NUMR 000022074938125407696639612634051450002300133645305442590000469309405442590000240044488884444888800
901...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR 0000000 L13NEW ACCOUNT NUMBER NEW ID NUMBER N1EMPLOYER NAME 1ST LI
ZONE FFFFFFFF4DFFDC4CCCEDE4DEDCCD4444444444444444DCE4CC4DEDCCD4444444444DCCDDDCD4DCDC4444444444444444FEE4DC
NUMR 00000000313556013364530544259000000000005560940544259000000005154736859051450000000000000000123039
1001...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR NE OF EMPLOYER ADDRESS 2ND LINE OF EMPLOYER ADDRESS EMPLOYER CITY ST123451234OCCUPATION
ZONE DC4DC4CDDDDDEC4CCDCCEE4444FDC4DCDC4DC4CDDDDDEC4CCDCCEE4444CDDDDDEC4CCEE44444444EEFFFFFFFFFFDCEDCECDD4
NUMR 5506605473685901449522000025403955066054736859014495220000547368590393800000002312345123463347139650
1101...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR
ZONE 44444444
NUMR 00000000
1201...5...
```

Note: The Block Descriptor Word shifts the first record of each block over 4 positions.

POS. 1- 4 = Block Descriptor Word
POS. 5- 8 = Record Descriptor Word
POS. 9 = Processing Indicator
POS. 10- 17 = Time Stamp
POS. 18 = Reserved
POS. 19- 38 = Identification Number
POS. 39- 40 = Cycle Identifier
POS. 41- 70 = Account Number
POS. 71 = Portfolio Type
POS. 72- 73 = Account Type
POS. 74- 78 = Date Opened
POS. 79- 83 = Credit Limit
POS. 84- 88 = Highest Credit
POS. 89- 91 = Terms Duration
POS. 92 = Terms Frequency
POS. 93- 97 = Scheduled Monthly Payment
POS. 98-102 = Actual Payment Amount
POS. 103-104 = Account Status
POS. 105 = Payment Rating
POS. 106-129 = Payment History Profile
POS. 130-131 = Special Comment
POS. 132-133 = Compliance Condition Code
POS. 134-138 = Current Balance
POS. 139-143 = Amount Past Due
POS. 144-148 = Original Charge-Off Amount
POS. 149-153 = Date of Account Information
POS. 154-158 = Date Of 1st Delinquency
POS. 159-163 = Date Closed
POS. 164-168 = Date Of Last Payment
POS. 169 = Interest Type Indicator
POS. 170-186 = Reserved
POS. 187-211 = Surname
POS. 212-231 = First Name
POS. 232-251 = Middle Name
POS. 252 = Generation Code
POS. 253-257 = SSN
POS. 258-262 = Date of Birth
POS. 263-268 = Telephone Number
POS. 269 = ECOA Code
POS. 270-271 = Consumer Info Indicator
POS. 272-273 = Country Code
POS. 274-305 = Address - Line 1
POS. 306-337 = Address - Line 2
POS. 338-357 = City
POS. 358-359 = State
POS. 360-368 = Postal/Zip Code
POS. 369 = Address Indicator
POS. 370 = Residence Code

(continued)

366 FORMAT - TRAILER RECORD (VARIABLE BLOCKED)

[illegible]

Note: The Block Descriptor Word shifts the first record of each block over 4 positions.

```

POS.    1-   4 = Block Descriptor Word
POS.    5-   8 = Record Descriptor Word
POS.   9-  15 = Record Identifier
POS.  16-  20 = Total Base Records
POS.  21-  25 = Reserved
POS.  26-  30 = Total Status DF
POS.  31-  35 = Total J1 Segments
POS.  36-  40 = Total J2 Segments
POS.  41-  45 = Block Count
POS.  46-  50 = Total Status DA
POS.  51-  55 = Total Status 05
POS.  56-  60 = Total Status 11
POS.  61-  65 = Total Status 13
POS.  66-  70 = Total Status 61
POS.  71-  75 = Total Status 62
POS.  76-  80 = Total Status 63
POS.  81-  85 = Total Status 64
POS.  86-  90 = Total Status 65
POS.  91-  95 = Total Status 71
POS.  96-100 = Total Status 78
POS. 101-105 = Total Status 80
POS. 106-110 = Total Status 82
POS. 111-115 = Total Status 83
POS. 116-120 = Total Status 84
POS. 121-125 = Total Status 88
POS. 126-130 = Total Status 89
POS. 131-135 = Total Status 93
POS. 136-140 = Total Status 94
POS. 141-145 = Total Status 95
POS. 146-150 = Total Status 96
POS. 151-155 = Total Status 97
POS. 156-160 = Total ECOA Z
POS. 161-165 = Total Employment Segments
POS. 166-170 = Total Orig Creditor Segs
POS. 171-175 = Total Purch/Sold Segments
POS. 176-180 = Total Mort Info Segments
POS. 181-185 = Total Special Payment Segs
POS. 186-190 = Total Change Segments
POS. 191-195 = Total SSN All
POS. 196-200 = Total SSN Base
POS. 201-205 = Total SSN J1
POS. 206-210 = Total SSN J2
POS. 211-215 = Total Dates of Birth All
POS. 216-220 = Total Dates of Birth Base
POS. 221-225 = Total Dates of Birth J1
POS. 226-230 = Total Dates of Birth J2
POS. 231-235 = Total Phone # All
POS. 236-370 = Reserved

```

426 FORMAT - HEADER RECORD (FIXED LENGTH)

[illegible]

```
...continue to blank-fill out to 1364 characters...
```

[illegible]

(continued)

```

POS.    1-   4 = Record Descriptor Word
POS.    5-  10 = Record Identifier
POS.   11-  12 = Cycle Identifier
POS.   13-  22 = Innovis Program ID
POS.   23-  32 = Equifax Program ID
POS.   33-  37 = Experian Program ID
POS.   38-  47 = TransUnion Program ID
POS.   48-  55 = Activity Date
POS.   56-  63 = Date Created
POS.   64-  71 = Program Date
POS.   72-  79 = Program Revision Date
POS.   80-119 = Reporter Name
POS. 120-215 = Reporter Address
POS. 216-225 = Reporter Phone #
POS. 226-265 = Software Vendor Name
POS. 266-270 = Software Version #
POS. 271-280 = MicroBilt/PRBC Prog. ID
POS. 281-426 = Reserved
POS.427-1364 = Blank Fill

```

[illegible]

(continued)

426 FORMAT - DATA RECORD (FIXED LENGTH) CONTINUED

CHAR	ID NUMBER	N1EMPLOYER NAME	1ST LINE OF EMPLOYER ADDRESS	2ND LINE OF EMPLOY
ZONE	4CC4DEBCCD44444444	DFCDDDBECD4DCDC4444444444444444	FEE4DCDC4DC4CDDDBECD4CCDC	EE4444FDC4DCDC4DC4CDDDBE
NUMR	0940544259000000051547368590514500000000000000000	12303955066054736859014495220000254039550660547368		
	1201...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....			
CHAR	ER ADDRESS	EMPLOYER CITY	ST123451234O	OCCUPATION
ZONE	CD4CCDC	EE44444444	EEFFFFFFFFFF	DDCCEDCECDD444444444
NUMR	5901449522000054736859039380000000023123451234633471396500000000			
	1301...5...10...15...20...25...30...35...40...45...50...55...60...6			

See Attachment for Segment definitions.

(continued)

426 FORMAT - TRAILER RECORD (FIXED LENGTH)

[illegible]

```
...continue to blank-fill out to 1364 characters...
```

[illegible]

```

POS.      1-   4   = Record Descriptor Word
POS.      5-  11   = Record Identifier
POS.     12-  20   = Total Base Records
POS.     21-  29   = Reserved
POS.     30-  38   = Total Status DF
POS.     39-  47   = Total J1 Segments
POS.     48-  56   = Total J2 Segments
POS.     57-  65   = Block Count
POS.     66-  74   = Total Status DA
POS.     75-  83   = Total Status 05
POS.     84-  92   = Total Status 11
POS.     93-101   = Total Status 13
POS.    102-110   = Total Status 61
POS.    111-119   = Total Status 62
POS.    120-128   = Total Status 63
POS.    129-137   = Total Status 64
POS.    138-146   = Total Status 65
POS.    147-155   = Total Status 71
POS.    156-164   = Total Status 78
POS.    165-173   = Total Status 80
POS.    174-182   = Total Status 82
POS.    183-191   = Total Status 83
POS.    192-200   = Total Status 84
POS.    201-209   = Total Status 88
POS.    210-218   = Total Status 89
POS.    219-227   = Total Status 93
POS.    228-236   = Total Status 94
POS.    237-245   = Total Status 95
POS.    246-254   = Total Status 96
POS.    255-263   = Total Status 97
POS.    264-272   = Total ECOA Z
POS.    273-281   = Total Employment Segments
POS.    282-290   = Total Original Creditor Segments
POS.    291-299   = Total Purchased/Sold Segments
POS.    300-308   = Total Mortgage Info Segments
POS.    309-317   = Total Special Payment Segments
POS.    318-326   = Total Change Segments
POS.    327-335   = Total SSN All
POS.    336-344   = Total SSN Base
POS.    345-353   = Total SSN J1
POS.    354-362   = Total SSN J2
POS.    363-371   = Total Dates of Birth All
POS.    372-380   = Total Dates of Birth Base
POS.    381-389   = Total Dates of Birth J1
POS.    390-398   = Total Dates of Birth J2
POS.    399-407   = Total Telephone #s All
POS.    408-426   = Reserved
POS. 427-1364   = Blank Fill

```

ATTACHMENT - SEGMENT DEFINITIONS

J1 Segment

Pos. 1- 2 = Segment Identifier
Pos. 3 = Reserved
Pos. 4- 28 = Surname
Pos. 29- 48 = First Name
Pos. 49- 68 = Middle Name
Pos. 69 = Generation Code
Pos. 70- 78 = Social Security Number
Pos. 79- 86 = Date of Birth
Pos. 87- 96 = Telephone Number
Pos. 97 = ECOA Code
Pos. 98- 99 = Consumer Information Indicator
Pos. 100 = Reserved

J2 Segment

Pos. 1- 2 = Segment Identifier
Pos. 3 = Reserved
Pos. 4- 28 = Surname
Pos. 29- 48 = First Name
Pos. 49- 68 = Middle Name
Pos. 69 = Generation Code
Pos. 70- 78 = Social Security Number
Pos. 79- 86 = Date of Birth
Pos. 87- 96 = Telephone Number
Pos. 97 = ECOA Code
Pos. 98- 99 = Consumer Information Indicator
Pos. 100-101 = Country Code
Pos. 102-133 = First Line of Address
Pos. 134-165 = Second Line of Address
Pos. 166-185 = City
Pos. 186-187 = State
Pos. 188-196 = Postal/Zip Code
Pos. 197 = Address Indicator
Pos. 198 = Residence Code
Pos. 199-200 = Reserved

K1 Segment

Pos. 1- 2 = Segment Identifier
Pos. 3-32 = Original Creditor Name
Pos. 33-34 = Creditor Classification

K2 Segment

Pos. 1- 2 = Segment Identifier
Pos. 3 = Purchased From/Sold To Indicator
Pos. 4-33 = Purchased From or Sold To Name
Pos. 34 = Reserved

K3 Segment

Pos. 1- 2 = Segment Identifier
Pos. 3- 4 = Agency Identifier
Pos. 5-22 = Account Number
Pos. 23-40 = Mortgage Identification Number

K4 Segment

Pos. 1- 2 = Segment Identifier
Pos. 3- 4 = Specialized Payment Indicator
Pos. 5-12 = Deferred Payment Start Date
Pos. 13-20 = Balloon Payment Due Date
Pos. 21-29 = Balloon Payment Amount
Pos. 30 = Reserved

L1 Segment

Pos. 1- 2 = Segment Identifier
Pos. 3 = Change Indicator
Pos. 4-33 = New Account Number
Pos. 34-53 = New Identification Number
Pos. 54 = Reserved

N1 Segment

Pos. 1- 2 = Segment Identifier
Pos. 3- 32 = Employer Name
Pos. 33- 64 = First Line of Employer Address
Pos. 65- 96 = Second Line of Employer Address
Pos. 97-116 = Employer City
Pos. 117-118 = Employer State
Pos. 119-127 = Employer Postal/Zip Code
Pos. 128-145 = Occupation
Pos. 146 = Reserved

Frequently Asked Questions and Answers

Please note that within these reporting guidelines, certain fields are mentioned that provide specific guidance for the situations described. For all other Metro 2® fields, the standard guidelines described within the Field Definitions module should be followed.

Segments and Appendages (6-6)

1. How is the Base Segment used?
2. What if we don't currently capture data for a specific field in our system?
3. How are the J1 and J2 Segments used?
4. When reporting fixed-length records, can the J2 segment be reported for all consumers, whether they live at the same or different address as the primary borrower? If the address is the same, can the address fields be blank?
5. How is the L1 Segment used?
6. How are fixed-length records reported if no appendage (e.g., J1, J2) information is available?
7. How are variable-length records reported if no appendage (e.g., J1, J2) information is available?

BDW / RDW (6-8)

8. What is the BDW and how is it used?
9. What is the RDW and how is it used?

Delinquency Reporting (6-8)

10. How are delinquencies calculated?

Cycle Reporting (6-8)

11. When is cycle reporting appropriate, versus month-end reporting?

Account Status, Payment Rating, Special Comment (6-9)

12. How do Account Statuses, Payment Ratings and Special Comments interact?

ECOA Requirements (6-10)

13. How do I comply with ECOA?
14. ECOA Codes:
 - (a) How is an ECOA change reported?
 - (b) What is the difference between ECOA Codes T (Association with Account Terminated) and Z (Delete Consumer)?

(continued)

Frequently Asked Questions and Answers

FCRA Requirements (6-11)

15. The Fair Credit Reporting Act requires certain information to be reported with regard to returned checks. What are those requirements?

Deleting Accounts/Borrowers (6-12)

16. How should an account, or a specific borrower, be deleted from the consumer reporting agencies' files?

Consumer Information (6-12)

17. How should a new borrower be added to an existing account?
18. How should a consumer's association with an existing account be terminated?
19. How should deceased borrowers be reported?
20. How should a business account be reported when a consumer is personally liable?

Duplicate Tradelines (6-14)

21. What causes duplicate tradelines?

First Time Reporters (6-15)

22. Are there any special reporting requirements for a first time reporter when sending data to the consumer reporting agencies?

Accounts Included in Bankruptcy (6-16)

23. How should an account be reported when the consumer files bankruptcy, but the account is not included in the bankruptcy?
24. How should an account included in bankruptcy be reported if a "Relief from Stay" is granted to the creditor?
25. How should an account that has been included in Bankruptcy be reported when a consumer is making payments or has paid the account in full, even though the account has not been reaffirmed?
26. Is there a preferred method of reporting when accounts are completely or partially reaffirmed in bankruptcy?

(continued)

Frequently Asked Questions and Answers

Accounts Included in Bankruptcy (6-18)

27. Accounts included in Bankruptcy Chapter 7 or 11:
Original reporting guidance:
(a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 7 or 11?
(b) How should an account be reported when one borrower filed Bankruptcy Chapter 7 or 11 and the other borrower did not?
Alternate simplified reporting guidance:
(c) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 7 or 11?
(d) How should an account be reported when one borrower filed Bankruptcy Chapter 7 or 11 and the other borrower did not?
28. Accounts included in Bankruptcy Chapter 12 or 13:
Original reporting guidance:
(a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 12 or 13?
(b) How should an account be reported when one borrower filed Bankruptcy Chapter 12 or 13 and the other borrower did not?
Alternate simplified reporting guidance:
(c) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 12 or 13?
(d) How should an account be reported when one borrower filed Bankruptcy Chapter 12 or 13 and the other borrower did not?
29. How should a secured debt (e.g., mortgage account) be reported when a consumer completes the required payments through a Bankruptcy Chapter 12 or 13 plan, but the account is still open and the consumer is continuing to make payments?
30. How should multiple bankruptcies (i.e., the same or different chapters) be reported for the different associated borrowers on an account?
31. How should bankruptcies be reported when the consumer voluntarily surrenders the merchandise or redeems the merchandise?
32. How should an account be reported when a Bankruptcy case has been closed or terminated without being discharged or dismissed?

Reporting Scenarios (6-49)

33. When and how should Debit Cards be reported?
34. Charge-offs:
(a) How should charged off accounts be reported?
(b) How should paid charge-off accounts be reported?
35. If a credit card or account is in dispute or temporarily unavailable for use because the credit grantor is conducting an investigation (due to a request from the consumer, such as potential identity theft or other reason), how should the account be reported?

(continued)

Frequently Asked Questions and Answers

Reporting Scenarios (6-51)

36. How should an account be reported when an auto lease is paid in full, yet there are over mileage charges, excess wear and tear charges, or other outstanding charges on the account?
37. How should an account be reported when an auto lease is prepaid – where entire lease payment is paid at the time of opening?
38. How should accounts that are paid in full for less than the full balance (i.e., settled) be reported?
39. How should a paid in full, closed account be reported?
40. How should a closed account be reported that has an outstanding balance?
41. How long should paid accounts (Account Status Code 13, 61-65) continue to be reported?
42. How should a renegotiated/refinanced loan be reported?
43. How should lost or stolen credit cards be reported?
44. How should deferred loans be reported?
45. How should accounts in forbearance be reported?
46. How should accounts that have been transferred be reported?
47. How should accounts that have been sold to another company be reported?
48. How should accounts that have been purchased from another company be reported?
49. How are “payment reversal” transactions handled when reporting Date of Last Payment, Date of First Delinquency, Payment History Profile and Actual Payment Amount?
50. Consumer loans may have multiple payment schedules, which may each have different payment frequencies (e.g., principal amount due annually and interest amount due monthly). How should these loans be reported?
51. How should credit cards with no preset spending limits be reported that have terms allowing consumers to exceed the credit limits (i.e., Flexible Spending Credit Cards)?
52. How should the different stages of foreclosure be reported?
53. How should alternatives to foreclosure (i.e., Deed in Lieu and Short Sale) be reported?
54. How should a secured account (i.e., mortgage, home equity or other secured account) be reported when the collateral is released but there is an outstanding balance due?
55. How should full loan assumptions be reported?
56. How should simple loan assumptions be reported?
57. How should reverse mortgages be reported?
58. What are the available options for reporting an account affected by a natural or declared disaster?

(continued)

Frequently Asked Questions and Answers

Reporting Scenarios (6-74)

- 59. How should deposit accounts, with overdraft protection, be reported that have been overdrawn?
- 60. How should prepaid credit cards/gift cards be reported?
- 61. How should an account be reported when it is included in a Personal Receivership plan (Wisconsin Chapter 128)?
- 62. How should an account be reported when merchandise has been repossessed?
- 63. How should an account be reported when the consumer has voluntarily surrendered the merchandise?
- 64. How should a replacement credit card be reported (i.e., credit card replaced with a new account number)?
- 65. How should an account be reported when the creditor files an IRS Form 1099-C?
- 66. How should timeshare mortgages and timeshare loans be reported?
- 67. How should a modified loan be reported?
- 68. How should an account be reported when it is updated more than one time during a given monthly reporting period; e.g., an account that is moved to recovery?
- 69. How should a debt extinguished under state law be reported?

Frequently Asked Questions and Answers

Please note that within these reporting guidelines, certain fields are mentioned that provide specific guidance for the situations described. For all other Metro 2® fields, the standard guidelines described within the Field Definitions module should be followed.

SEGMENTS AND APPENDAGES

1. **Question: How is the Base Segment used?**

Answer: The Base Segment of the Metro 2® Format is used to report the identification information for the primary borrower, as well as all of the pertinent account information, such as Date Opened, High Credit, Current Balance and Account Status.

2. **Question: What if we don't currently capture data for a specific field in our system?**

Answer: Refer to Record Layouts within the Metro 2® Format section for designated Required Fields.

If you have a question about a specific field that is not on your system, contact all the consumer reporting agencies to determine if that field is required. Some fields must be reported to comply with legislative requirements, while others are used to make the reported data complete and accurate.

3. **Question: How are the J1 and J2 Segments used?**

Answer: In general, appendages in the Metro 2® Format are designed to allow the data furnisher to report additional information about the account by adding the appropriate appendages to the end of the Base Segment. Two segments: J1 and J2 are used in reporting the names and addresses (if different from the primary borrower) of individuals who are associated with the account.

- The J1 Segment is used to report a consumer who is associated with the account who lives at the same address as the individual reported in the Base Segment.
- The J2 Segment is used to report a consumer who is associated with the account and who lives at the same or different address from the individual reported in the Base Segment.

Frequently Asked Questions and Answers

4. **Question: When reporting fixed-length records, can the J2 Segment be reported for all consumers, whether they live at the same or different address as the primary borrower? If the address is the same, can the address fields be blank?**

Answer: If you are reporting fixed-length records, you may choose to report only J2 Segments for all associated consumers. In that case, the J2 Segments must always contain addresses, even if the addresses are the same as those reported in the Base Segments.

5. **Question: How is the L1 Segment used?**

Answer: The L1 Segment is used to report a new Account Number or a new Identification Number in situations when one or both of these numbers has changed since the last reporting period. The Change Indicator field in the L1 Segment specifies whether the change is to the Account Number, the Identification Number or both.

The old Account Number is reported in the Consumer Account Number field of the Base Segment and the new Account Number is reported in the New Consumer Account Number field of the L1 Segment. The old Identification Number is reported in the Identification Number field of the Base Segment and the new Identification Number is reported in the New Identification Number field of the L1 Segment.

The L1 Segment should be reported at the time of the Account Number/Identification Number change and should be reported only once. The following month, the new numbers should appear in the Base Segment.

6. **Question: How are fixed-length records reported if no appendage (e.g., J1, J2) information is available?**

Answer: If no information is available for the appendages, provide the Segment Identifier (e.g., J1, J2) and blank fill the remainder of the segment.

7. **Question: How are variable-length records reported if no appendage (e.g., J1, J2) information is available?**

Answer: Do not report the appendage.

Frequently Asked Questions and Answers

BDW / RDW

8. Question: What is the BDW and how is it used?

Answer: For variable-length blocks, the Block Descriptor Word (BDW) is typically systems-generated and contains a value equal to the length of each block of data. The BDW must be reported when using the packed format or when reporting variable length records. The BDW is used internally by each consumer reporting agency's system to determine the number of bytes in each block.

9. Question: What is the RDW and how is it used?

Answer: The Record Descriptor Word (RDW) contains a value equal to the number of bytes in each record. A data record includes the Base Segment and any appendages (e.g., J1, K1, N1).

The RDW is a required field and may be systems-generated by the data furnisher's system. If not, it must be hard-coded in the program.

The RDW is used internally by each consumer reporting agency's system to determine the number of bytes in each data record.

DELINQUENCY REPORTING

10. Question: How are delinquencies calculated?

Answer: Delinquencies should be calculated from the due date. For consumer reporting purposes, an account is not deemed to be delinquent until it is at least 30 days (Account Status Code 71) past the due date.

CYCLE REPORTING

11. Question: When is cycle reporting appropriate, versus month-end reporting?

Answer: Cycle reporting is generally appropriate when the data furnisher has multiple billing cycles. Reporting would take place at the end of each billing cycle, resulting in more accurate and current reporting of account statuses.

Frequently Asked Questions and Answers

ACCOUNT STATUS, PAYMENT RATING, SPECIAL COMMENT

12. Question: How do Account Statuses, Payment Ratings and Special Comments interact?

Answer: The Account Status (Field 17A) is used to report the current condition of the accounts, such as current or 30 days past the due date. The Payment Rating (Field 17B), which is required for certain Account Statuses, is used to report whether the account is current, past due, in collections or charged off within the current month's reporting period. The Special Comment (Field 19) is used to provide additional information about the account. These codes are used together to provide a complete picture of the account.

Examples:

- An account is reported with Account Status Code 80 (90 days past the due date) and Special Comment M (Account closed at credit grantor's request). Since both codes are reported, credit grantors know the current condition of the account, and that the account is closed to further charges, at the credit grantor's request.
- An account is reported with Account Status Code 13 (Paid), Payment Rating 3 (90 days past the due date) and Special Comment AU (Account paid in full for less than the full balance). This combination of codes provides complete information for credit grantors: the account is paid, the consumer was 90 days past the due date during the final month and the account was settled for less than the full balance.

Frequently Asked Questions and Answers

ECOA REQUIREMENTS

13. Question: How do I comply with ECOA?

Answer: While ECOA requires only the reporting of spouse information, industry practices encourage the reporting of all consumers associated with an account. The correct ECOA Code should be reported in the Base, J1 and J2 Segments.

14. Questions: ECOA Codes: (a) How is an ECOA Code change reported?

Answer: Change the ECOA Code to the new value in the segment that has changed. Refer to field descriptions for each segment (Base, J1 and J2) for lists of applicable ECOA codes.

(b) What is the difference between ECOA Codes T (Association with Account Terminated) and Z (Delete Consumer)?

Answer: ECOA Code 'T' should be reported when a consumer is no longer associated with an account. In subsequent reporting periods, this consumer should not be reported. The account, including payment history reported prior to the termination will be retained, but future updates will not be applied to the account for this consumer.

ECOA Code 'Z' should be reported when a consumer was reported in error and the account, including payment history, should be deleted from this consumer's file. It is imperative that ECOA Code 'Z' is reported only on the consumer who was inaccurately reported. In subsequent reporting periods, this consumer should not be reported.

Notes: Only inaccurately reported consumers should be deleted. Additionally, as per Frequently Asked Questions & Answers 27 and 28, authorized users should be deleted from accounts included in bankruptcy since authorized users are not contractually responsible for payments.

In cases where the only remaining individual associated to the account is an authorized user, the authorized user should be reported with ECOA Code Z to delete the account from the authorized user's credit file.

Frequently Asked Questions and Answers

FCRA REQUIREMENTS

15. Question: The Fair Credit Reporting Act requires certain information to be reported with regard to returned checks. What are those requirements?

Answer: For companies who report returned checks, such as collection agencies, debt buyers or check guarantee companies, there are four reporting guidelines:

- The Date Opened (Base Segment Field 10) should contain the date of the check.
- The Highest Credit or Original Loan Amount (Base Segment Field 12) should contain the original amount of the check, excluding fees and interest.
- The Original Creditor Name (K1 Segment Field 2) should contain the name of the payee; i.e., the name of the company to which the check was written. Report the Creditor Classification (K1 Segment Field 3) to identify the original creditor's type of business. Note that code 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.
- The FCRA Compliance/Date of First Delinquency (Base Segment Field 25) should contain the date the check was returned for nonsufficient funds. If not available, report the date of the check.

Frequently Asked Questions and Answers

DELETING ACCOUNTS/BORROWERS

16. Question: How should an account, or a specific borrower, be deleted from the consumer reporting agencies' files?

Answer: It is imperative that only inaccurate accounts be deleted from the consumer reporting agencies' files. In order to maintain the accuracy and integrity of consumer files, historical consumer credit information must be reported in a factual and objective manner. Paid derogatory accounts, such as collections, should be reported as paid; they should not be deleted.

To delete an entire account, **for reasons other than fraud**, report Account Status Code **DA** (Field 17A). All borrowers will be deleted along with the account history.

To delete an entire account, **due to confirmed fraud**, report Account Status Code **DF** (Field 17A). All borrowers will be deleted along with the account history.

To delete a specific borrower, report **Z** in the ECOA Code field of the segment containing the consumer to be deleted.

CONSUMER INFORMATION

17. Question: How should a new borrower be added to an existing account?

Answer: Append a J1 or J2 Segment for the new borrower to the Base Segment.

- A J1 Segment should be used to add a new borrower living at the same address as the consumer reported in the Base Segment.
- A J2 segment should be used to add a new borrower living at a different address from the consumer reported in the Base Segment.

18. Question: How should a consumer's association with an existing account be terminated?

Answer: Report **T** in the ECOA Code field (Base Segment Field 37, J1/J2 Segment Field 10) in the segment containing the consumer for whom the association is to be terminated. All payment history for this account will be retained. Do not report this consumer in subsequent reporting periods.

Frequently Asked Questions and Answers

19. Question: How should deceased borrowers be reported?

Answer: Deceased borrowers should be reported through use of ECOA Code **X** in the appropriate Base Segment Field 37 or J1/J2 Segment Field 10. An ECOA Code **X** should be reported **only** for the deceased consumer; not all consumers associated with the account.

If only one borrower is associated with the account and the borrower is reported as deceased, discontinue reporting the entire account after the ECOA Code **X** is reported. Do not report the account with a trustee or estate name.

If there are multiple associated borrowers and one borrower is reported as deceased, continue reporting the account, but discontinue reporting the deceased borrower after the ECOA Code **X** is reported. If the deceased borrower had been reported in the Base Segment, another borrower must be moved into the Base Segment for subsequent reporting.

In cases where the only remaining individual associated to the account is an authorized user, the authorized user should be reported with ECOA Code Z to delete the account from the authorized user's credit file.

Important: Do not report ECOA Code **X** until you have received a legally-sufficient death notice; e.g., death certificate. Data furnishers should consult with internal Legal counsel or Compliance area regarding what constitutes a legally-sufficient death notice.

Reporting a consumer as deceased provides valuable information on the credit report. If another consumer tries to use the identity of a deceased consumer, the "deceased" information will appear on the credit report, helping to deter the fraudulent activity.

Note: Debt Buyers and Third Party Collection Agencies should refer to the Debt Buyer/Collection Agency Reporting module for guidance on reporting deceased borrowers.

Frequently Asked Questions and Answers

20. Question: How should a business account be reported when a consumer is personally liable?

Answer:

- Report the consumer's information in the Base Segment with ECOA Code **2** (Joint/Contractual Liability) or **5** (Co-maker or Guarantor) in Field 37, as applicable.
- Report the business name in the J2 Segment starting in the Surname field (Field 3). The business name may continue into the First and Middle Name fields if needed.
- Report ECOA Code **W** (Business/Commercial) in Field 10 of the J2 Segment.

Note: The business name will not be added to the consumer credit databases.

DUPLICATE TRADELINES

21. Question: What causes duplicate tradelines?

Answer: Any change in Account Number, Identification Number, Portfolio Type and/or Date Opened may cause duplication if the consumer reporting agencies are not notified prior to the change.

Frequently Asked Questions and Answers

FIRST TIME REPORTERS

22. Question: Are there any special reporting requirements for a first time reporter when sending data to the consumer reporting agencies?

Answer: It is very important to ensure that the FCRA Compliance/Date of First Delinquency is reported accurately.

When historical credit information is reported in the Payment History Profile (Field 18), the Date of First Delinquency must reflect the date of the first delinquency that led to the earliest delinquency reported in the Payment History Profile. ***In this situation, the Date of First Delinquency must be reported, regardless of the Account Status Code being reported.***

Examples:

Account Status = 93 (Collection)
Payment History Profile = GGGGGGGGGGGG666654321100
Date of Account Information = 03/30/2020
Date of First Delinquency = 05/24/2018

In the above example, 05/24/2018 represents the date of the earliest 30-day delinquency represented in the Payment History Profile that led to the Collection (Code G) being reported.

Account Status = 11 (Current)
Payment History Profile = 000000GGGGGGGGGGGGGGGGGGGG
Date of Account Information = 03/30/2020
Date of First Delinquency = 08/12/2017

In the above example, 08/12/2017 represents the date of the earliest 30-day delinquency that led to the Collection (Code G) reported in the Payment History Profile. In this scenario, the 30-day delinquency was outside the time period represented in the Payment History Profile.

Frequently Asked Questions and Answers

ACCOUNTS INCLUDED IN BANKRUPTCY

Please note that within these reporting guidelines, certain fields are mentioned that provide specific guidance for the situations described. For all other Metro 2® fields, the standard guidelines described within the Field Definitions module should be followed.

23. Question: How should an account be reported when the consumer files bankruptcy, but the account is not included in the bankruptcy?

Answer: For accounts that are not discharged in the bankruptcy, follow these guidelines:

- When notified of the petition, report the applicable Consumer Information Indicator.
Note: The consumer may be protected by the automatic stay until the bankruptcy is discharged or, for Chapter 12 or 13, the repayment plan is completed.
- Follow the guidance in FAQ 27 or 28, as applicable, for the months between petition and final resolution.
- For Chapter 7 or 11, when the bankruptcy is discharged, report Consumer Information Indicator **Q** to remove the petition indicator and continue reporting the account normally going forward.
- For Chapter 12 or 13, when the repayment plan is completed, report Consumer Information Indicator **Q** to remove the petition indicator and continue reporting the account normally going forward. If an associated borrower who was not included in the bankruptcy filing had been terminated from the account, re-report this borrower with the applicable ECOA Code (not T).

24. Question: How should an account included in bankruptcy be reported if a “Relief from Stay” is granted to the creditor?

Answer: Report the appropriate Consumer Information Indicator for the borrower who included the account in bankruptcy (filer).

Note: Even though the creditor can pursue collection of collateral, the account is still included in bankruptcy. The reporting of the Consumer Information Indicator has no impact on the creditor's ability to collect.

Frequently Asked Questions and Answers

25. Question: How should an account that has been included in Bankruptcy be reported when a consumer is making payments or has paid the account in full, even though the account has not been reaffirmed?

Answer: Unless the account has been reaffirmed through the Bankruptcy Court, the account is included in Bankruptcy. For credit reporting purposes, the appropriate Bankruptcy Consumer Information Indicator must be reported.

Refer to Frequently Asked Questions & Answers 27 and 28 for detailed reporting guidelines.

26. Question: Is there a preferred method of reporting when accounts are completely or partially reaffirmed in bankruptcy?

Answer: For accounts that are completely reaffirmed in bankruptcy, report the appropriate Account Status (Field 17A) and Consumer Information Indicator **R**, which states "Chapter 7 Reaffirmation of Debt". The Consumer Information Indicator (Base Segment Field 38 and J1/J2 Segment Field 11) should be reported for each consumer who reaffirmed the debt.

Note: Do not report the discharged indicator (CII **E**) if the reaffirmation remains in effect. If the reaffirmation of debt is rescinded, report CII **V** (Chapter 7 Reaffirmation of Debt Rescinded).

For accounts that are partially reaffirmed in bankruptcy, report a separate tradeline with a new Account Number for the portion of the account that is in repayment. For this new tradeline, report Consumer Information Indicator **R** for each affected consumer, which states "Chapter 7 Reaffirmation of Debt", plus the appropriate Account Status. For that portion of the original tradeline which is still included in bankruptcy, report the appropriate Account Status (Field 17A), the appropriate Consumer Information Indicator (Base Segment Field 38 and J1/J2 Segment Field 11), and adjust the Current Balance (Field 21) accordingly.

If the partial reaffirmation of debt is subsequently rescinded, report the new account with Account Status Code **DA** to delete the account. The original account, which was reported with the appropriate bankruptcy Consumer Information Indicator, will reflect that the account is included in bankruptcy.

Frequently Asked Questions and Answers

27. Questions: Accounts included in Bankruptcy Chapter 7 or 11:

Note: Letters (a) and (b) contain the original reporting guidance for accounts included in Bankruptcy Chapters 7 and 11, which will eventually be retired. Letters (c) and (d) offer alternate simplified bankruptcy guidance, which will eventually replace the original reporting guidance.

(a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 7 or 11?

Answer: Report the account according to the following guidelines:

	All Borrowers Filed Bankruptcy Chapter 7 or 11
Month BK Filed	<ul style="list-style-type: none">• CII = A or B (Petition for Chapter 7 or 11 Bankruptcy)• Account Status = status at time of petition• Payment History = first character based on previous month's status plus prior history• Current Balance = outstanding balance amount• Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due• Amount Past Due = amount past due at the time of petition• Date of Account Information = current month's date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should be deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution	<ul style="list-style-type: none">• CII = Blank (previous petition value reported is retained) or CII = A or B• Account Status = status at time of petition• Payment History = increment first position with value 'D' (plus history reported prior to bankruptcy filing)• Current Balance = outstanding balance amount• Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due• Amount Past Due = amount past due at the time of petition• Date of Account Information = current month's date
Reaffirmation of Debt or Lease Assumption	<ul style="list-style-type: none">• CII = R (Chapter 7 Reaffirmation of Debt) or 2A (Lease Assumption)• All other Metro 2® account level information should be reported as of the Date of Account Information

FAQ 27(a) continued on next page

Frequently Asked Questions and Answers

FAQ 27(a) (continued)

	All Borrowers Filed Bankruptcy Chapter 7 or 11
BK Discharged	<ul style="list-style-type: none"> • CII = E or F (Discharged through BK Chapter 7 or 11) • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus prior months' history) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount past due at the time of petition • Date of Account Information = current month's date <p>Note: After reporting the discharge CII E or F for all Filers, discontinue reporting the account.</p>
Reaffirmation of Debt Rescinded	<ul style="list-style-type: none"> • CII = V (Chapter 7 Reaffirmation of Debt Rescinded) • Account Status = status at time of petition • Payment History = increment first position based on previous month's Account Status, plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount past due at the time of petition • Date of Account Information = current month's date <p>Notes: After reporting CII 'V' for all Filers, in the following monthly reporting period:</p> <ul style="list-style-type: none"> • If the bankruptcy has been discharged, report the applicable discharge CII (CII = E or F), then discontinue reporting the account going forward. • If the bankruptcy has not yet been discharged, continue reporting the account and Filers with the applicable CIIs (CII = A or B). <p>If the bankruptcy is discharged in the same monthly reporting period that the Reaffirmation of Debt is rescinded, report the applicable discharge CII (CII = E or F). Do not report CII 'V'.</p>

FAQ 27(a) continued on next page

Frequently Asked Questions and Answers

FAQ 27(a) (continued)

	All Borrowers Filed Bankruptcy Chapter 7 or 11
BK Dismissed	<ul style="list-style-type: none">• CII = Q (Removal value)• All other Metro 2® account level field information should be reported as of the Date of Account Information <p>Note: The “D’s” reported in the Payment History Profile from the time the petition was filed until the dismissal should not be removed, as the consumer was protected by a stay during those months.</p>
BK Withdrawn	<ul style="list-style-type: none">• CII = Q (Removal value)• All other Metro 2® account level field information should be reported as of the Date of Account Information <p>Note: The “D’s” reported in the Payment History Profile from the time the petition was filed until the petition was withdrawn should not be removed, as the consumer was protected by a stay during those months.</p>

Frequently Asked Questions and Answers

27(b) How should an account be reported when one borrower filed Bankruptcy Chapter 7 or 11 and the other borrower did not?

Answer: Report the account according to the following guidelines:

	Filer(s) and Non-Filer(s)
Month BK Filed	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = A or B (Petition for BK Chapter 7 or 11) • Account Status = applicable status for consumer(s) who did <u>not</u> file Bankruptcy • Payment History = first character based on previous month's status plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = total amount that is 30 days or more past the due date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should be deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = Blank (previous petition value reported is retained) or CII = A or B • Account Status = applicable status for consumer(s) who did <u>not</u> file Bankruptcy • All other Metro 2® account level field information should be reported as of the Date of Account Information for the Non-Filer(s)
Reaffirmation of Debt or Lease Assumption	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = R (Chapter 7 Reaffirmation of Debt) or 2A (Lease Assumption) • All other Metro 2® account level field information should be reported as of the Date of Account Information
BK Discharged	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = E or F (Discharged through BK Chapter 7 or 11) • All other Metro 2® account level field information should be reported as of the Date of Account Information for the Non-Filer(s) <p>Note: After reporting the discharge CII for the Filer(s), discontinue reporting the Filer(s).</p>

FAQ 27(b) continued on next page

Frequently Asked Questions and Answers

FAQ 27(b) (continued)

	Filer(s) and Non-Filer(s)
Reaffirmation of Debt Rescinded	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = V (Chapter 7 Reaffirmation of Debt Rescinded) • All other Metro 2® account level field information should be reported as of the Date of Account Information for the Non-Filer(s) <p>Notes: After reporting CII 'V' for the Filer(s), in the following monthly reporting period:</p> <ul style="list-style-type: none"> • If the bankruptcy has been discharged, report the applicable discharge CII (CII = E or F). In subsequent reporting periods, discontinue reporting the Filer(s) associated to the account. • If the bankruptcy has not yet been discharged, continue reporting the account and Filer(s) with the applicable CIIs (CII = A or B). <p>If the bankruptcy is discharged in the same monthly reporting period that the Reaffirmation of Debt is rescinded, report the applicable discharge CII (CII = E or F) for the Filer(s). Do not report CII 'V'.</p>
BK Dismissed	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = Q (Removal value) • All other Metro 2® account level field information should be reported as of the Date of Account Information
BK Withdrawn	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = Q (Removal value) • All other Metro 2® account level field information should be reported as of the Date of Account Information

Note: The Consumer Information Indicator is required for reporting when applicable for the filing consumer(s).

Frequently Asked Questions and Answers

27(c) How should an account be reported when all associated borrowers filed Bankruptcy Chapter 7 or 11?

Answer: Report the account according to the following guidelines:

	All Borrowers Filed Bankruptcy Chapter 7 or 11
Month BK Filed	<ul style="list-style-type: none">• CII = A or B (Petition for Chapter 7 or 11 Bankruptcy)• Account Status = status as of the Date of Account Information• Payment History = first character based on previous month's status plus prior history• Current Balance = balance as of the Date of Account Information• Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due• Amount Past Due = amount as of the Date of Account Information• Date of Account Information = current month's date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should be deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution	<ul style="list-style-type: none">• CII = A or B or Blank (previous petition value reported is retained)• Account Status = status as of the Date of Account Information• Payment History = first character based on previous month's status plus prior history• Current Balance = balance as of the Date of Account Information• Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due• Amount Past Due = amount as of the Date of Account Information• Date of Account Information = current month's date
Reaffirmation of Debt or Lease Assumption	<ul style="list-style-type: none">• CII = R (Chapter 7 Reaffirmation of Debt) or 2A (Lease Assumption)• All other Metro 2® account level field information should be reported as of the Date of Account Information

FAQ 27(c) continued on next page

Frequently Asked Questions and Answers

FAQ 27(c) (continued)

	All Borrowers Filed Bankruptcy Chapter 7 or 11
BK Discharged	<ul style="list-style-type: none"> • CII = E or F (Discharged through BK Chapter 7 or 11) • Account Status = status as of the Date of Account Information • Payment History = first character based on previous month's status plus prior history • Current Balance = balance as of the Date of Account Information • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount as of the Date of Account Information • Date of Account Information = current month's date <p>Note: After reporting the discharge CII E or F for all Filers, discontinue reporting the account.</p>
Reaffirmation of Debt Rescinded	<ul style="list-style-type: none"> • CII = V (Chapter 7 Reaffirmation of Debt Rescinded) • Account Status = status as of the Date of Account Information • Payment History = first character based on previous month's status plus prior history • Current Balance = balance as of the Date of Account Information • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount as of the Date of Account Information • Date of Account Information = current month's date <p>Notes: After reporting CII 'V' for all Filers, in the following monthly reporting period:</p> <ul style="list-style-type: none"> • If the bankruptcy has been discharged, report the applicable discharge CII (CII = E or F), then discontinue reporting the account going forward. • If the bankruptcy has not yet been discharged, continue reporting the account and Filers with the applicable CII's (CII = A or B). <p>If the bankruptcy is discharged in the same monthly reporting period that the Reaffirmation of Debt is rescinded, report the applicable discharge CII (CII = E or F). Do not report CII 'V'.</p>
BK Dismissed	<ul style="list-style-type: none"> • CII = Q (Removal value) • All other Metro 2® account level field information should be reported as of the Date of Account Information
BK Withdrawn	<ul style="list-style-type: none"> • CII = Q (Removal value) • All other Metro 2® account level field information should be reported as of the Date of Account Information

Frequently Asked Questions and Answers

27(d) How should an account be reported when one borrower filed Bankruptcy Chapter 7 or 11 and the other borrower did not?

Answer: Report the account according to the following guidelines:

	Filer(s) and Non-Filer(s)
Month BK Filed	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = A or B (Petition for BK Chapter 7 or 11) • Account Status = status as of the Date of Account Information • Payment History = first character based on previous month's status plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = total amount that is 30 days or more past the due date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should be deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = A or B or Blank (previous petition value reported is retained) • Account Status = status as of the Date of Account Information • All other Metro 2® account level field information should be reported as of the Date of Account Information
Reaffirmation of Debt or Lease Assumption	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = R (Chapter 7 Reaffirmation of Debt) or 2A (Lease Assumption) • All other Metro 2® account level field information should be reported as of the Date of Account Information
BK Discharged	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = E or F (Discharged through BK Chapter 7 or 11) • All other Metro 2® account level field information should be reported as of the Date of Account Information <p>Note: After reporting the discharge CII E or F, discontinue reporting the Filer(s) associated to the account.</p>

FAQ 27(d) continued on next page

Frequently Asked Questions and Answers

FAQ 27(d) (continued)

	Filer(s) and Non-Filer(s)
Reaffirmation of Debt Rescinded	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = V (Chapter 7 Reaffirmation of Debt Rescinded) • All other Metro 2® account level field information should be reported as of the Date of Account Information <p>Notes: After reporting CII 'V' for the Filer(s), in the following monthly reporting period:</p> <ul style="list-style-type: none"> • If the bankruptcy has been discharged, report the applicable discharge CII (CII = E or F). In subsequent reporting periods, discontinue reporting the Filer(s) associated to the account. • If the bankruptcy has not yet been discharged, continue reporting the account and Filer(s) with the applicable CIIs (CII = A or B). <p>If the bankruptcy is discharged in the same monthly reporting period that the Reaffirmation of Debt is rescinded, report the applicable discharge CII (CII = E or F) for the Filer(s). Do not report CII 'V'.</p>
BK Dismissed	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = Q (removal value) • All other Metro 2® account level field information should be reported as of the Date of Account Information
BK Withdrawn	<ul style="list-style-type: none"> • CII for Non-Filer(s) = Blank • CII for Filer(s) = Q (removal value) • All other Metro 2® account level field information should be reported as of the Date of Account Information

Note: The Consumer Information Indicator is required for reporting when applicable for the filing consumer(s).

Frequently Asked Questions and Answers

28. Questions: Accounts included in Bankruptcy Chapter 12 or 13:

Note: Letters (a) and (b) contain the original reporting guidance for accounts included in Bankruptcy Chapters 12 and 13, which will eventually be retired. Letters (c) and (d) offer alternate simplified bankruptcy guidance, which will eventually replace the original reporting guidance.

(a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 12 or 13?

Answer: Report the account according to the following guidelines:

	All Borrowers Filed Bankruptcy Chapter 12 or 13
Month BK Filed	<ul style="list-style-type: none">• CII = C or D (Petition for Chapter 12 or 13 Bankruptcy)• Account Status = status at time of petition• Payment History = first character based on previous month's Account Status, plus prior history• Current Balance = outstanding balance amount• Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due• Amount Past Due = amount past due at the time of petition• Date of Account Information = current month's date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should be deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution	<ul style="list-style-type: none">• CII = Blank (previous value reported is retained) or CII = C or D• Account Status = status at time of petition• Payment History = increment first position with value 'D' (plus history reported prior to BK filing)• Current Balance = outstanding balance amount• Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due• Amount Past Due = amount past due at the time of petition• Date of Account Information = current month's date

FAQ 28(a) continued on next page

Frequently Asked Questions and Answers

FAQ 28(a) (continued)

	All Borrowers Filed Bankruptcy Chapter 12 or 13
BK Chapter 12 or 13 Converted to BK Chapter 7	<ul style="list-style-type: none"> • CII = A (Petition for Chapter 7 Bankruptcy) or E (Discharged through Bankruptcy Chapter 7), as applicable • Date of First Delinquency = If the Account Status is 11, continue reporting the original Chapter 12 or 13 bankruptcy petition or notification date. <p>Notes: The "D's" reported in the Payment History Profile from the time the petition was filed until the bankruptcy converted to Chapter 7 should not be removed, as the consumer was protected by a stay during those months.</p> <p>With the reporting of the BK Chapter 7 indicator, continue updating the account by following FAQ 27(a).</p>
Plan Confirmed	<ul style="list-style-type: none"> • CII = Blank (previous value reported is retained) or CII = C or D • Account Status = status at time of petition • Payment History = increment with value 'D' (plus prior months' history) • Current Balance = Chapter 12 or 13 plan balance¹, which should decline as payments are made • Amount Past Due = Zero • Terms Duration & Terms Frequency = report changed values, if applicable • Scheduled Monthly Payment Amount = Chapter 12 or 13 plan payment amount • Date of Account Information = current month's date
Plan Completed – All payments made according to plan – no further obligation	<ul style="list-style-type: none"> • CII = G or H (Discharged/completed through BK Chapter 12 or 13) • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus prior months' history) • Current Balance = Zero • Scheduled Monthly Payment Amount = Zero • Amount Past Due = Zero • Date of Account Information = current month's date <p>Note: After reporting CII 'G' or 'H' for all Filers, discontinue reporting the account.</p>

FAQ 28(a) continued on next page

¹ If the Chapter 12 or 13 plan balance amount is not clearly communicated to the lender, the lender should consult with internal Legal to determine what amount to report in the Current Balance field. If the lender (e.g., unsecured creditor) does not receive a confirmed amount from the Bankruptcy court, report the outstanding balance.

Frequently Asked Questions and Answers

FAQ 28(a) (continued)

	All Borrowers Filed Bankruptcy Chapter 12 or 13
Plan Completed – All payments made according to plan – consumer continues to make payments (example: mortgage account)	<ul style="list-style-type: none">• CII = Q (Removal value)• Account Status = status as of the Date of Account Information• Payment History = first month, increment first position with value 'D'; in subsequent months, increment based on prior month's status• Date of Account Information = current month's date• All other Metro 2® account level field information should be reported as of the Date of Account Information
BK Dismissed or Withdrawn	<ul style="list-style-type: none">• CII = Q (Removal value)• All other Metro 2® account level field information should be reported as of the Date of Account Information <p>Note: The "D's" reported in the Payment History Profile from the time the petition was filed until the dismissal (or petition withdrawn) should not be removed, as the consumer was protected by a stay during those months.</p>

Frequently Asked Questions and Answers

28(b) How should an account be reported when one borrower filed Bankruptcy Chapter 12 or 13 and the other borrower did not?

Answer: When a Bankruptcy Chapter 12 or 13 is filed by one borrower and there is also a Non-Filer associated to the account, both may be protected by an automatic stay. The Non-Filer may be protected through the completion of the plan. Therefore, the Non-Filer should be terminated from the account until the plan is completed.

	Filer(s)	Non-Filer(s) – Protected by Stay through plan completion
Month BK Filed	<ul style="list-style-type: none"> • CII = C or D (Petition for Chapter 12 or 13 Bankruptcy) • Account Status = status at time of petition • Payment History = first character based on previous month's status, plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount past due at the time of petition • Date of Account Information = current month's date 	<ul style="list-style-type: none"> • CII = Blank • ECOA Code = T (Terminated) <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should be deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution	<ul style="list-style-type: none"> • CII = Blank (previous petition value reported is retained) or CII = C or D • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus history reported prior to BK filing) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount past due at the time of petition • Date of Account Information = current month's date 	Do not report Non-Filer(s).

FAQ 28(b) continued on next page

Frequently Asked Questions and Answers

FAQ 28(b) (continued)

	Filer(s)	Non-Filer(s) – Protected by Stay through plan completion
BK Chapter 12 or 13 Converted to BK Chapter 7	<ul style="list-style-type: none"> • CII = A (Petition for Chapter 7 Bankruptcy) or E (Discharged through Bankruptcy Chapter 7), as applicable • Date of First Delinquency = If the Account Status is 11, continue reporting the original Chapter 12 or 13 bankruptcy petition or notification date. <p>Notes: The “D’s reported in the Payment History Profile from the time the petition was filed until the bankruptcy converted to Chapter 7 should not be removed, as the consumer was protected by a stay during those months.</p> <p>With the reporting of the BK Chapter 7 indicator, continue updating the account by following FAQ 27(b).</p>	<ul style="list-style-type: none"> • ECOA = original value that defines the consumer’s relationship to the account (not T) • CII = Blank <p>Note: At this point, continue updating the account by following FAQ 27(b).</p>
Plan Confirmed	<ul style="list-style-type: none"> • CII = Blank (previous petition value reported is retained) or CII = C or D • Account Status = status at time of petition • Payment History = increment with value ‘D’ (plus prior months’ history) • Current Balance = Chapter 12 or 13 plan balance¹, which should decline as payments are made • Amount Past Due = Zero • Terms Duration & Terms Frequency = report changed values, if applicable • Scheduled Monthly Payment Amount = Chapter 12 or 13 plan payment amount • Date of Account Information = current month’s date 	Do not report Non-Filer(s).

FAQ 28(b) continued on next page

¹ If the Chapter 12 or 13 plan balance amount is not clearly communicated to the lender, the lender should consult with internal Legal to determine what amount to report in the Current Balance field. If the lender (e.g., unsecured creditor) does not receive a confirmed amount from the Bankruptcy court, report the outstanding balance.

Frequently Asked Questions and Answers

FAQ 28(b) (continued)

	Filer(s)	Non-Filer(s) – Protected by Stay through plan completion
Plan Completed – All payments made according to plan – no further obligation by Filer	<ul style="list-style-type: none"> CII = G or H (Discharged/completed through BK Chapter 12 or 13) Account Status = status at time of petition Payment History = increment first position with value 'D' (plus prior months' history) Current Balance = Zero Scheduled Monthly Payment Amount = Zero Amount Past Due = Zero Date of Account Information = current month's date <p>Note: After reporting CII 'G' or 'H', discontinue reporting the Filer(s).</p>	<p>If creditor intends to collect additional monies from Non-Filer after all plan payments are completed, Non-Filer should be reported <u>no earlier than one month after</u> the CII 'G' or 'H' is reported for the Filer.</p> <p>First month:</p> <ul style="list-style-type: none"> EOA = applicable value, such as 1 or 2 (not T) Account Status = status as of the Date of Account Information Payment History Profile = Report value 'D' in the monthly reporting periods representing the duration of the Filer's bankruptcy (i.e., petition through discharge/completion). Current Balance = outstanding balance amount Scheduled Monthly Payment Amount = original or updated amount of the monthly payment due for the Non-Filer(s) going forward Amount Past Due = total amount that is 30 days or more past the due date <p>Note: If the Account Status is current (Status Code 11), this field should be zero.</p> <p>In subsequent months, all other Metro 2® account level field information should be reported as of the Date of Account Information for the Non-Filer(s).</p>

FAQ 28(b) continued on next page

Frequently Asked Questions and Answers

FAQ 28(b) (continued)

	Filer(s)	Non-Filer(s) – Protected by Stay through plan completion
Plan Completed – All payments made according to plan – consumer continues to make payments (example: mortgage account)	<ul style="list-style-type: none"> • CII = Q (Removal Value) • Account Status = status as of the Date of Account Information • Payment History = first month, increment first position with value 'D'; in subsequent months, increment based on prior month's status • Date of Account Information = current month's date • All other Metro 2® account level field information should be reported as of the Date of Account Information 	<p>Non-Filer can be re-reported in the same month CII Q is reported for the filer.</p> <ul style="list-style-type: none"> • CII = Blank • ECOA = applicable value, such as 2 (not T)
BK Dismissed or Withdrawn	<ul style="list-style-type: none"> • CII = Q (Removal value) • All other Metro 2® account level field information should be reported as of the Date of Account Information <p>Note: The “D’s” reported in the Payment History Profile from the time the petition was filed until the dismissal (or petition withdrawn) should not be removed, as the consumer was protected by a stay during those months.</p>	<p>Re-report Non-Filer(s).</p> <ul style="list-style-type: none"> • CII = Blank • ECOA = applicable value, such as 2 (not T)

Note: The Consumer Information Indicator is required for reporting when applicable for the filing consumer(s).

Frequently Asked Questions and Answers

28(c) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 12 or 13?

Answer: Report the account according to the following guidelines:

	All Borrowers Filed Bankruptcy Chapter 12 or 13
Month BK Filed	<ul style="list-style-type: none">• CII = C or D (Petition for Chapter 12 or 13 Bankruptcy)• Account Status = status as of the Date of Account Information• Payment History = first character based on previous month's status, plus prior history• Current Balance = balance as of the Date of Account Information• Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due• Amount Past Due = amount as of the Date of Account Information• Date of Account Information = current month's date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should be deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution	<ul style="list-style-type: none">• CII = C or D or Blank (previous value reported is retained)• Account Status = status as of the Date of Account Information• Payment History = increment first position with value 'D' (plus history reported prior to BK filing)• Current Balance = balance as of the Date of Account Information• Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due• Amount Past Due = amount as of the Date of Account Information• Date of Account Information = current month's date <p>Note: This guidance should also be followed for confirmed plans.</p>

FAQ 28(c) continued on next page

Frequently Asked Questions and Answers

FAQ 28(c) (continued)

	All Borrowers Filed Bankruptcy Chapter 12 or 13
BK Chapter 12 or 13 Converted to BK Chapter 7	<ul style="list-style-type: none"> • CII = A (Petition for Chapter 7 Bankruptcy) or E (Discharged through Bankruptcy Chapter 7), as applicable • Date of First Delinquency = If the Account Status is 11, continue reporting the original Chapter 12 or 13 bankruptcy petition or notification date. <p>Notes: The "D's reported in the Payment History Profile from the time the petition was filed until the bankruptcy converted to Chapter 7 should not be removed, as the consumer was protected by a stay during those months.</p> <p>With the reporting of the BK Chapter 7 indicator, continue updating the account by following FAQ 27 (c).</p>
Plan Completed – All payments made according to plan – no further obligation	<ul style="list-style-type: none"> • CII = G or H (Discharged/completed through BK Chapter 12 or 13) • Account Status = status as of the Date of Account Information • Payment History = increment first position with value 'D' (plus prior months' history) • Current Balance = Zero • Scheduled Monthly Payment Amount = Zero • Amount Past Due = Zero • Date of Account Information = current month's date <p>Note: After reporting CII 'G' or 'H' for all Filers, discontinue reporting the account.</p>
Plan Completed – All payments made according to plan – consumer continues to make payments (example: mortgage account)	<ul style="list-style-type: none"> • CII = Q (Removal value) • Account Status = status as of the Date of Account Information • Payment History = first month, increment first position with value 'D'; in subsequent months, increment based on prior month's status • Date of Account Information = current month's date • All other Metro 2® account level field information should be reported as of the Date of Account Information
BK Dismissed or Withdrawn	<ul style="list-style-type: none"> • CII = Q (removal code) • All other Metro 2® account level field information should be reported as of the Date of Account Information <p>Note: The "D's" reported in the Payment History Profile from the time the petition was filed until the dismissal (or petition withdrawn) should not be removed, as the consumer was protected by a stay during those months.</p>

Frequently Asked Questions and Answers

28(d) How should an account be reported when one borrower filed Bankruptcy Chapter 12 or 13 and the other borrower did not?

Answer: When a Bankruptcy Chapter 12 or 13 is filed by one borrower and there is also a Non-Filer associated to the account, both may be protected by an automatic stay. The Non-Filer may be protected through the completion of the plan. Therefore, the Non-Filer should be terminated from the account until the plan is completed.

	Filer(s)	Non-Filer(s) – Protected by Stay through plan completion
Month BK Filed	<ul style="list-style-type: none"> • CII = C or D (Petition for Chapter 12 or 13 Bankruptcy) • Account Status = status as of the Date of Account Information • Payment History = first character based on previous month's status, plus prior history • Current Balance = balance as of the Date of Account Information • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount as of the Date of Account Information • Date of Account Information = current month's date 	<ul style="list-style-type: none"> • CII = Blank • ECOA Code = T (Terminated) <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should be deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution	<ul style="list-style-type: none"> • CII = C or D or Blank (previous petition value reported is retained) • Account Status = status as of the Date of Account Information • Payment History = increment first position with value 'D' (plus history reported prior to BK filing) • Current Balance = balance as of the Date of Account Information • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount as of the Date of Account Information • Date of Account Information = current month's date <p>Note: This guidance should also be followed for confirmed plans.</p>	Do not report Non-Filer(s).

FAQ 28(d) continued on next page

Frequently Asked Questions and Answers

FAQ 28(d) (continued)

	Filer(s)	Non-Filer(s) – Protected by Stay through plan completion
BK Chapter 12 or 13 Converted to BK Chapter 7	<ul style="list-style-type: none">• CII = A (Petition for Chapter 7 Bankruptcy) or E (Discharged through Bankruptcy Chapter 7), as applicable• Date of First Delinquency = If the Account Status is 11, continue reporting the original Chapter 12 or 13 bankruptcy petition or notification date. <p>Notes: The “D’s reported in the Payment History Profile from the time the petition was filed until the bankruptcy converted to Chapter 7 should not be removed, as the consumer was protected by a stay during those months.</p> <p>With the reporting of the BK Chapter 7 indicator, continue updating the account by following FAQ 27(d).</p>	<ul style="list-style-type: none">• ECOA = original value that defines the consumer’s relationship to the account (not T)• CII = Blank <p>Note: At this point, continue updating the account by following FAQ 27(d).</p>

FAQ 28(d) continued on next page

Frequently Asked Questions and Answers

FAQ 28(d) (continued)

	Filer(s)	Non-Filer(s) – Protected by Stay through plan completion
Plan Completed – All payments made according to plan – no further obligation by Filer	<ul style="list-style-type: none"> • CII = G or H (Discharged/completed through BK Chapter 12 or 13) • Account Status = status as of the Date of Account Information • Payment History = increment first position with value 'D' (plus prior months' history) • Current Balance = Zero • Scheduled Monthly Payment Amount = Zero • Amount Past Due = Zero • Date of Account Information = current month's date <p>Note: After reporting CII 'G' or 'H', discontinue reporting the Filer(s).</p>	<p>If creditor intends to collect additional monies from Non-Filer after all plan payments are completed, Non-Filer should be reported <u>no earlier than one month after</u> the CII 'G' or 'H' is reported for the Filer.</p> <p>First month:</p> <ul style="list-style-type: none"> • ECOA = applicable value, such as 1 or 2 (not T) • Account Status = status as of the Date of Account Information • Payment History Profile = Report value 'D' in the monthly reporting periods representing the duration of the Filer's bankruptcy (i.e., petition through discharge/completion). • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = original or updated amount of the monthly payment due for the Non-Filer(s) going forward • Amount Past Due = total amount that is 30 days or more past the due date <p>Note: If the Account Status is current (Status Code 11), this field should be zero.</p> <p>In subsequent months, all other Metro 2® account level field information should be reported as of the Date of Account Information for the Non-Filer(s).</p>

FAQ 28(d) continued on next page

Frequently Asked Questions and Answers

FAQ 28(d) (continued)

	Filer(s)	Non-Filer(s) – Protected by Stay through plan completion
Plan Completed – All payments made according to plan – consumer continues to make payments (example: mortgage account)	<ul style="list-style-type: none"> • CII = Q (Removal value) • Account Status = status as of the Date of Account Information • Payment History = first month, increment first position with value 'D'; in subsequent months, increment based on prior month's status • Date of Account Information = current month's date • All other Metro 2® account level field information should be reported as of the Date of Account Information 	<p>Non-Filer can be re-reported in the same month CII Q is reported for the filer.</p> <ul style="list-style-type: none"> • CII = Blank • ECOA = applicable value (not T)
BK Dismissed or Withdrawn	<ul style="list-style-type: none"> • CII = Q (removal value) • All other Metro 2® account level field information should be reported as of the Date of Account Information <p>Note: The "D's" reported in the Payment History Profile from the time the petition was filed until the dismissal (or petition withdrawn) should not be removed, as the consumer was protected by a stay during those months.</p>	<p>Re-report Non-Filer(s).</p> <ul style="list-style-type: none"> • CII = Blank • ECOA = applicable value (not T)

Note: The Consumer Information Indicator is required for reporting when applicable for the filing consumer(s).

Frequently Asked Questions and Answers

- 29. Question: How should a secured debt (e.g., mortgage account) be reported when a consumer completes the required payments through a Bankruptcy Chapter 12 or 13 plan, but the account is still open and the consumer is continuing to make payments?**

Answer: While the consumer is making payments through the plan, Consumer Information Indicator **C** (Petition for Chapter 12 Bankruptcy) or **D** (Petition for Chapter 13 Bankruptcy) should be reported. If the account is still open when the plan payments have been completed, report Consumer Information Indicator **Q** to remove the petition indicator so that ongoing payments made by the consumer can be reported.

Frequently Asked Questions and Answers

30. Question: How should multiple bankruptcies (i.e., the same or different chapters) be reported for the different associated borrowers on an account?

Answer: Report the account according to the following guidelines:

A	Both borrowers file Bankruptcy Chapter 7 in the same reporting period.	Follow FAQ 27(c).
B	Borrower 1 files Bankruptcy Chapter 7 – Borrower 2 is a Non-Filer. At a later time, Borrower 2 files Bankruptcy Chapter 7.	<p>When Borrower 1 files BK Chapter 7, follow FAQ 27(d) because at this time, there is also a Non-Filer on this account. Therefore, for the account level fields, report account information for the consumer who did <u>not</u> file the bankruptcy.</p> <p>When Borrower 2 files BK Chapter 7 at a later date, begin following FAQ 27(c) since all borrowers are now filers.</p> <ul style="list-style-type: none"> • Reaffirmation of Debt – If Borrower 1 reaffirms the debt, report CII = R. As per FAQ 27(c), all other Metro 2® account level field information should be reported as of the Date of Account Information. • Discharged – If the bankruptcy for Borrower 1 is discharged, report CII = E. Discontinue reporting Borrower 1 on subsequent updates. Continue reporting for Borrower 2 according to FAQ 27(c). • Dismissed = If the bankruptcy for Borrower 1 is dismissed, report CII = Q (to remove the petition indicator). Continue reporting the account according to FAQ 27(d) since Borrower 1 is now a Non-Filer.
C	Both borrowers file Bankruptcy Chapter 13 in the same reporting period.	Follow FAQ 28(c).

FAQ 30 continued on next page

Frequently Asked Questions and Answers

FAQ 30 (continued)

D	<p>Borrower 1 files Bankruptcy Chapter 13 – Borrower 2 is a Non-Filer. At a later time, Borrower 2 files Bankruptcy Chapter 13.</p>	<p>When Borrower 1 files BK Chapter 13, follow FAQ 28(d) because at this time, there is also a Non-Filer on this account. As per the FAQ, the Non-Filer should be terminated from the account using ECOA Code T.</p> <p>When Borrower 2 files BK Chapter 13, re-report this borrower as follows:</p> <ul style="list-style-type: none">• Consumer Information Indicator = D• ECOA Code = applicable value such as 2 (not T) <p>Continue reporting the account following FAQ 28(c).</p> <p>When Borrower 1 completes the BK Chapter 13 plan, report CII = H for Borrower 1. Discontinue reporting Borrower 1 on subsequent updates.</p> <p>When Borrower 2 completes the BK Chapter 13 plan, report CII = H for Borrower 2. If all payments have been completed according to the plan and there is no further obligation, discontinue reporting the account on subsequent updates. However, if all payments have been completed according to the plans and the account is still open, both borrowers may be reported with CII = Q to remove the BK indicators so that ongoing payments made by the consumers may be reported.</p> <p>Important Note: If the asset (e.g., mortgage) is included in only one of the borrower's bankruptcy plans, CII D should be reported only for the borrower whose bankruptcy plan includes the account. The other borrower should be terminated from the account since the asset is not included in this borrower's bankruptcy plan.</p> <p><i>Scenario D continued on next page</i></p>
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Frequently Asked Questions and Answers

FAQ 30 (continued)

D	<i>Continued from previous page</i> Borrower 1 files Bankruptcy Chapter 13 – Borrower 2 is a Non-Filer. At a later time, Borrower 2 files Bankruptcy Chapter 13.	Notes regarding bankruptcy plan dismissals: <ul style="list-style-type: none">• If the bankruptcy for Borrower 1 is dismissed <u>prior</u> to Borrower 2 filing bankruptcy, report Consumer Information Indicator Q (to remove the petition indicator), report the account information as it applies going forward, and re-report the Non-Filer with the applicable ECOA Code (not T). In this scenario, when Borrower 2 later files Bankruptcy Chapter 13, follow FAQ 28(d).• If the bankruptcy for Borrower 1 is dismissed <u>after</u> Borrower 2 files bankruptcy, report Consumer Information Indicator Q (to remove the petition indicator) and ECOA Code T for Borrower 1, who may now be protected by Borrower 2's bankruptcy. Continue updating this account by following FAQ 28(d).• If the bankruptcy for Borrower 2 is dismissed and the bankruptcy for Borrower 1 is still active, report Consumer Information Indicator Q and ECOA Code T for Borrower 2. Continue updating the account according to FAQ 28(d).• If the bankruptcy for Borrower 2 is dismissed and the bankruptcy for Borrower 1 was previously dismissed, report Borrower 1 with the applicable ECOA Code (not T). As this account no longer has any borrowers in an active bankruptcy, report the account normally going forward.
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FAQ 30 continued on next page

Frequently Asked Questions and Answers

FAQ 30 (continued)

E	Borrower 1 files Bankruptcy Chapter 7 and Borrower 2 files Bankruptcy Chapter 13 in the same reporting period.	<p>In the month the BK's were filed, Borrower 1 should be reported with CII = A, and Borrower 2 should be reported with CII = D. (Each borrower may be protected by an automatic stay based on his or her bankruptcy filing.)</p> <ul style="list-style-type: none"> • Account Status = status as of the Date of Account Information • Payment History = first character based on previous month's Account Status, plus prior history • Current Balance = balance as of the Date of Account Information • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount as of the Date of Account Information • Date of Account Information = current month's date <p>Months between petition filed and BK resolution:</p> <ul style="list-style-type: none"> • CII = A for Borrower 1 and CII = D for Borrower 2, or Blank (previous values reported are retained) • Account Status = status as of the Date of Account Information • Payment History = increment first position with value 'D' (plus history reported prior to bankruptcy) • Current Balance = balance as of the Date of Account Information • Scheduled Monthly Payment Amount = amount of the scheduled monthly payment due • Amount Past Due = amount as of the Date of Account Information • Date of Account Information = current month's date <p>Scenario E continued on next page</p>
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Frequently Asked Questions and Answers

FAQ 30 (continued)

E	<p><i>Continued from previous page</i></p> <p>Borrower 1 files Bankruptcy Chapter 7 and Borrower 2 files Bankruptcy Chapter 13 in the same reporting period.</p>	<p>In subsequent months:</p> <p><u>Borrower 1:</u> Debt is Discharged:</p> <ul style="list-style-type: none">• CII = E (Discharged through BK Chapter 7)• Discontinue reporting Borrower 1 on subsequent updates. <p>Note: In this case, begin to follow FAQ 28(c) because at this point, Borrower 2 is the only borrower remaining on the account.</p> <p><u>Borrower 1:</u> BK is Dismissed:</p> <ul style="list-style-type: none">• CII = Q (to remove petition indicator)• ECOA Code = T (Terminated) if the BK Chapter 13 for Borrower 2 is still in petition or confirmed state. <p>Note that Borrower 1 may now be protected by the automatic stay of Borrower 2's BK Chapter 13.</p> <p>Continue to follow FAQ 28(d) because at this point, there is a filer and Non-Filer on the account.</p> <p><u>Borrower 2:</u> BK Dismissed:</p> <ul style="list-style-type: none">• CII = Q (to remove the petition indicator) <p>Continue reporting and follow FAQ 27(d) if the BK for Borrower 1 is still a Chapter 7 petition or discharge.</p>
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FAQ 30 continued on next page

Frequently Asked Questions and Answers

FAQ 30 (continued)

F	Borrower 1 files Bankruptcy Chapter 7 – Borrower 2 is a Non-Filer. At a later time, Borrower 2 files Bankruptcy Chapter 13.	<p>When Borrower 1 files BK Chapter 7, follow FAQ 27(d) because at this point, there is also a Non-Filer on the account.</p> <p>If the BK Chapter 7 for Borrower 1 is discharged, when Borrower 2 files BK Chapter 13 at a later date, follow FAQ 28(c) because Borrower 1 is no longer reported after the BK Chapter 7 discharge.</p> <p>If the BK Chapter 7 for Borrower 1 is dismissed, report CII = Q (to remove the petition indicator) and ECOA Code T to terminate this borrower from the account. At this point, Borrower 1 may be protected by the automatic stay of Borrower 2's BK Chapter 13. Continue to follow the guidance in FAQ 28(d).</p>
G	Borrower 1 files Bankruptcy Chapter 13 – Borrower 2 is a Non-Filer. At a later time, Borrower 2 files Bankruptcy Chapter 7.	<p>When Borrower 1 files BK Chapter 13, follow FAQ 28(d) because at this point, there is also a Non-Filer on this account. As per the FAQ, the Non-Filer (Borrower 2) should be terminated from the account using ECOA Code T.</p> <p>When Borrower 2 files BK Chapter 7, re-report this borrower with the original ECOA Code (not T) and CII = A (Petition for Chapter 7 BK). Follow the guidance in FAQ 28(c).</p> <p>If Borrower 2's BK is discharged, report CII = E (Chapter 7 BK Discharged). Discontinue reporting this consumer on subsequent updates and continue reporting the account and Borrower 1 following FAQ 28(c).</p> <p>If Borrower 2's BK is dismissed, report CII = Q (to remove the petition indicator) and ECOA Code T (Terminated) since this borrower may be protected by Borrower 1's Chapter 13 BK.</p>

Frequently Asked Questions and Answers

31. Question: How should bankruptcies be reported when the consumer voluntarily surrenders the merchandise or redeems the merchandise?

Answer: When a bankruptcy is filed, the consumer can voluntarily surrender the merchandise to the creditor. In this situation, report Account Status Code **95** (Voluntary Surrender) and the appropriate Consumer Information Indicator.

The consumer also has the option to pay fair market value, thereby redeeming the merchandise. In this situation, report Account Status Code **13** (Paid/closed account), Special Comment Code **AU** (Account paid in full for less than the full balance), and the appropriate Consumer Information Indicator.

32. Question: How should an account be reported when a Bankruptcy case has been closed or terminated without being discharged or dismissed?

Answer: Report Consumer Information Indicator **Q** to remove the previously-reported Bankruptcy Petition indicator. If the case is re-opened, report the Consumer Information Indicator for the appropriate disposition; e.g., petition, discharged or dismissed.

Note: A bankruptcy case may be closed or terminated when the consumer does not pay the applicable court fees or does not attend the required financial management class.

Frequently Asked Questions and Answers

Frequently Asked Questions and Answers

REPORTING SCENARIOS

Please note that within these reporting guidelines, certain fields are mentioned that provide specific guidance for the situations described. For all other Metro 2® fields, the standard guidelines described within the Field Definitions module should be followed.

33. Question: When and how should Debit Cards be reported?

Answer: Debit Cards should be reported only when backed by a line of credit or overdraft protection.

Report the following Base Segment fields as specified:

- Account Type Code = 43 (Debit Card)
- Portfolio Type = C (Line of Credit), O (Open) or R (Revolving) depending on the terms
- Credit Limit = assigned credit limit
- Highest Credit or Original Loan Amount = highest amount of credit utilized by the consumer when the overdraft protection was used

34. Questions: Charge-offs:

(a) How should charged off accounts be reported?

Answer: Report the following Base Segment fields:

- Scheduled Monthly Payment Amount = zero
- Account Status = 97 (Unpaid balance reported as a loss – charge-off)
- Current Balance and Amount Past Due = outstanding balance amount, which may include fees and interest. If payments are made by the consumer, report the declining balance in these two fields.
- Original Charge-off Amount = the original amount charged to loss, regardless of the declining balance. This field should not be changed.
- FCRA Compliance/Date of First Delinquency = the date of the first 30-day delinquency that led to the account being charged off
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), zero fill. For Revolving, Open and Line of Credit accounts (Portfolio Types R, O and C), if the account is closed, report the date the account was closed to further purchases. Otherwise, zero fill.
- Date of Last Payment = date the most recent payment was received

Note: If a small deficiency balance is being charged off for accounting and general ledger purposes only and the consumer is not being held responsible for this amount, **do not report** the account as a charge off. Deduct the charged off amount from the Current Balance of the ongoing account.

FAQ 34 continued on next page

Frequently Asked Questions and Answers

34(b) How should paid charge-off accounts be reported?

Answer: Report the following Base Segment fields:

- Scheduled Monthly Payment Amount = zero
- Account Status = 64 (Account paid in full, was a charge-off)
- Special Comment Code = If the account is settled for less than the full balance, include **AU**.
- Current Balance and Amount Past Due = zero
- Original Charge-off Amount = the original amount charged to loss
- Date of Account Information = date paid
- FCRA Compliance/Date of First Delinquency = the date of the first 30-day delinquency that led to the account being charged off
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), report the date the account was paid in full. For Revolving, Open and Line of Credit accounts (Portfolio Types R, O and C), report the date the account was closed to further purchases.
- Date of Last Payment = date the most recent payment was received

35. Question: If a credit card or account is in dispute or temporarily unavailable for use because the credit grantor is conducting an investigation (due to a request from the consumer, such as potential identity theft or other reason), how should the account be reported?

Answer: Continue to report the account as usual, but include Compliance Condition Code **XB**, which specifies "Account information disputed by consumer under the Fair Credit Reporting Act".

When the investigation is complete, if the account is valid for this consumer (i.e., not fraudulent), continue to report the account as usual. If any months of the payment history are invalid, use the Payment History Profile (Base Segment Field 18) to correct the history for those months. In addition, report Compliance Condition Code **XR** to remove the previously-reported **XB** or report Compliance Condition Code **XH**, which specifies "Account previously in dispute – investigation completed, reported by data furnisher".

When the investigation is complete, if it is discovered that the account was opened or used fraudulently, report Account Status Code **DF** to delete the account.

Note: If the consumer has submitted an identity theft report to you, certain obligations occur. Refer to the Fair Credit Reporting Act section 623(a)(6).

Frequently Asked Questions and Answers

36. Question: How should an account be reported when an auto lease is paid in full, yet there are over mileage charges, excess wear & tear charges, or other outstanding charges on the account?

Answer: When there are outstanding charges, continue to report the account with Special Comment Code **BD** (Full Termination, Balance Owing) and Account Status Code **11, 71, 78, 80, 82, 83, 84** or **93**. Do not change the Original Loan Amount, but add the outstanding charges to the Current Balance and Amount Past Due, if appropriate.

Even though the lease contract is terminated and all regular payments have been made in full, the account should not be reported as paid (Account Status Code 13) because there are other outstanding charges and the Current Balance is not yet zero. The fact that the lease is terminated is reported through the Special Comment BD.

When all outstanding charges have been paid in full, report Account Status Code **13** or **62**, as applicable.

If the fees are not paid and the outstanding amount is charged off, report Account Status Code **97** (Unpaid balance reported as a loss – charge-off).

37. Question: How should an account be reported when an auto lease is prepaid – where entire lease payment is paid at the time of opening?

Answer: Report Account Type **3A** (Auto Lease), Special Comment Code **BS** (Prepaid Lease), Terms Frequency **P** (Single Payment Loan), and Terms Duration **001**. Even though the account has been prepaid, do not report the Account Status as paid since the potential exists for lease end charges to be due on termination. Report the account as current (Account Status Code 11) while the lease is open.

If lease end charges apply, do not change the Original Loan Amount, but add the lease end charges to the Current Balance and, if appropriate, to the Amount Past Due. Report the Account Status Code that accurately describes how the lease end charges are being paid.

When all lease end charges have been paid in full, after termination, report the appropriate paid Account Status Code.

If the fees are not paid and the outstanding amount is charged off, report Account Status Code **97** (Unpaid balance reported as a loss – charge-off).

Frequently Asked Questions and Answers

38. Question: How should accounts that are paid in full for less than the full balance (i.e., settled) be reported?

Answer: Report the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = 13 or 61-65, as applicable
- Payment Rating = required when the Account Status Code is 13 or 65.
Blank fill for Account Status Codes 61-64.
- Special Comment = AU (Account paid in full for less than the full balance)
- Current Balance and Amount Past Due = zero
- Date of Account Information = the date the account was paid in full for less than the full balance
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), report the date the account was paid in full for less than the full balance. For Revolving and Line of Credit accounts (Portfolio Types R and C), report the date the account was closed to further charges. For Open accounts (Portfolio Type O), report the date the account was closed to further charges or paid in full, as applicable.

Frequently Asked Questions and Answers

39. Question: How should a paid in full, closed account be reported?

Answer: Report the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Actual Payment Amount = the amount actually received for this reporting period
- Credit Limit = For Revolving, Open and Line of Credit accounts, report the last assigned credit limit.
- Account Status Code = 13 or 61-65, as applicable
- Payment Rating = required when the Account Status Code is 13 or 65. Blank fill for Account Status Codes 61-64.
- Special Comment Code = M or CI may be reported if applicable for Revolving, Open and Line of Credit accounts
- **OR** Compliance Condition Code = XA may be reported if applicable for Revolving, Open and Line of Credit accounts.

Important Note: Do not report an account as closed by credit grantor **and** closed at consumer's request. Only one closed code can apply.

- Current Balance and Amount Past Due = zero
- Date of Account Information = Report the date the account was paid in full. For inactive accounts, report a date within the current reporting period when the account was closed to further use.

Important Note: Payoffs should not be backdated for credit reporting purposes. For example:

- Account reported as Account Status 11 (current) with Date of Account Information = 03/31/2020
 - Account marked as paid on 04/08/2020, but the paid effective date is 03/22/2020
 - Report account as Account Status 13 (paid) with Date of Account Information = 04/08/2020
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), report the date the account was paid in full. For Revolving and Line of Credit accounts (Portfolio Types R and C), report the date the account was closed to further charges. For Open accounts (Portfolio Type O), report the date the account was closed to further charges or paid in full, as applicable.

Frequently Asked Questions and Answers

40. Question: How should a closed account be reported that has an outstanding balance?

Answer: For Revolving, Open and Line of Credit accounts **only**, report the following Base Segment fields as specified:

- Portfolio Type = R (Revolving), O (Open) or C (Line of Credit) depending on the terms
- Credit Limit = report last assigned credit limit
- Account Status Code = 11, 71, 78, 80, 82-84, 93 or 97, as applicable
- Special Comment Code = M, if account closed by credit grantor
- **OR** Compliance Condition Code = if account closed at consumer's request, report the appropriate code XA, XD, XE or XJ

Important Note: Do not report an account as closed by credit grantor **and** closed at consumer's request. Only one closed code can apply.

- Current Balance = the outstanding balance amount as of the Date of Account Information
- Amount Past Due = required when the Account Status Code is 71, 78, 80, 82-84
- Date Closed = the date the account was closed

41. Question: How long should paid accounts (Account Status Codes 13, 61-65) continue to be reported?

Answer: Use the following guidelines if paid accounts are re-reported:

- Freeze the Account Status, Payment Rating, Payment History Profile and Date of Account Information as of the date the account was paid.
- Do not re-report paid accounts for more than three months.

Frequently Asked Questions and Answers

42. Question: How should a renegotiated/refinanced loan be reported?

Answer: The guidelines described below are used for renegotiated or refinanced loans that are **not** associated with one of the federal loan modification programs. There are three options for reporting:

1. If the original Account Number and Date Opened are retained, modify the amounts and terms as per the refinanced agreement. Fields that may be changed include Original Loan Amount, Terms Duration, Terms Frequency, Scheduled Monthly Payment Amount and Current Balance.

Note that the Terms Duration should reflect the terms for the life of the account. Therefore, for a loan modification, set the Terms Duration from the original Date Opened to the new maturity date.

Optional: Special Comment Code **CO** (Loan modified) may be reported. Note that this code is used when reporting accounts that are modified, but not under a federal government plan.

Special Comment **CO** may be reported as long as deemed appropriate by the data furnisher, or until another Special Comment becomes more critical. For the length of time the Special Comment should be reported, consult with your internal Legal or Compliance department.

2. If the original Account Number changes and the Date Opened remains the same, follow the above reporting guideline, and include an L1 Segment with the new Account Number. Refer to the L1 Segment specifications within the Field Definitions for reporting guidelines.
3. If the original Account Number and Date Opened change, report the original loan as specified:
 - Account Status Code = 13 (Paid)
 - Payment Rating = the appropriate code that identifies the status of the account within the current month's reporting period
 - Special Comment = AS (Account closed due to refinance)
 - Current Balance and Amount Past Due = zero

Report the newly refinanced/renewed loan with the new Account Number, new Date Opened and all other applicable fields. Payment history that occurred prior to the new Date Opened should not be reported with this account.

Note: For reporting guidelines specific to the federal loan modification programs, such as Making Home Affordable, Hope for Homeowners and the Fannie Mae/Freddie Mac Mortgage Loan Modification Program, refer to the module called "Mortgage Loan Modifications".

Frequently Asked Questions and Answers

43. Questions: Lost or Stolen Credit Cards:

(a) How should a lost or stolen credit card be reported when the consumer will retain the account, but will get a new Account Number?

Answer: There are two options for reporting:

1. **Preferred Option:** Report the L1 Segment to change the Account Number. Use of the L1 Segment allows the consumer reporting agencies to retain all prior account history. Continue to report the original Date Opened.

If the payment history is invalid due to the credit card being lost or stolen, use the Payment History Profile (Field 18) to correct the history. If accurate payment history is not known during the time frame when the credit card was lost or stolen, report value **D** for months that are unknown in the Payment History Profile. For example:

Date of Account Information = 03/15/2020
Account History = Always current
Unknown Months of History = January and February 2020
Payment History Profile = DD0000000000000000000000

2. Report Special Comment Code **BL** (Credit card lost or stolen), the appropriate Account Status Code (**not** DA or DF) and Current Balance of zero. Do not report this account on subsequent updates.

If the payment history is invalid due to the credit card being lost or stolen, use the Payment History Profile (Field 18) to correct the history. If accurate payment history is not known during the time frame when the credit card was lost or stolen, report value **D** for months that are unknown in the Payment History Profile. For example:

Date of Account Information = 03/15/2020
Account History = Always current
Unknown Months of History = January and February 2020
Payment History Profile = DD0000000000000000000000

In the following month's reporting period, report the new credit card as a separate account with a new Account Number, the same Date Opened as the lost/stolen account, and the appropriate Account Status Code and Current Balance.

Note: Payment history that occurred prior to the credit card being lost or stolen should **not** be reported under the new Account Number.

FAQ 43 continued on next page

Frequently Asked Questions and Answers

FAQ 43 (continued)

(b) How should a lost or stolen credit card be reported when the consumer does not want a replacement card and will pay off the existing account?

Answer: Continue reporting the account normally. Do **not** report Special Comment BL. Report Compliance Condition Code XA to denote 'Account closed at consumer's request'. When the Current Balance Amount reaches zero, report Account Status Code 13 and the applicable Payment Rating, along with Compliance Condition Code XA.

If the payment history is invalid due to the credit card being lost or stolen, use the Payment History Profile (Field 18) to correct the history. If accurate payment history is not known during the time frame when the credit card was lost or stolen, report value **D** for months that are unknown in the Payment History Profile. For example:

Date of Account Information = 03/15/2020

Account History = Always current

Unknown Months of History = January and February 2020

Payment History Profile = DD000000000000000000000000

Frequently Asked Questions and Answers

44. Question: How should deferred loans be reported?

Answer: Report the following Base Segment fields as specified:

- Terms Duration = blank
- Terms Frequency = D (Deferred)
- Highest Credit or Original Loan Amount = the total amount borrowed, excluding interest
- Scheduled Monthly Payment Amount = zero
- Account Status Code = 11 (Current account)
Payment History Profile = Use Character **B** to indicate accounts which have never been in repayment. Use Character **D** to indicate accounts that were previously in repayment but are now deferred.

Note: When an account goes into deferment, do not change the previously-reported account history in the Payment History Profile.

- Current Balance = outstanding balance amount
- Amount Past Due = zero

In the K4 Segment, report the Specialized Payment Indicator **02** for Deferred Payment. Also, report the Deferred Payment Start Date as the date the first payment will be due. If the deferred payment start date is not known, do not report the K4 Segment.

Important Notes: When the account goes into repayment, stop reporting the K4 Segment and begin reporting monthly payment information. Report valid values as per the repayment agreement in the following fields:

- Terms Duration
- Terms Frequency (other than **D**)
- Scheduled Monthly Payment Amount

Additionally, if the consumer was delinquent going into the deferment period, the two fields below must be considered when the consumer comes out of deferment and begins repayment.

- Account Status Code = appropriate code that specifies the status of the account when the account comes out of deferment
- Date of First Delinquency = if the Account Status is delinquent, the original date that led to the Account Status being reported prior to deferment

Frequently Asked Questions and Answers

45. Question: How should accounts in forbearance be reported?

Answer: Forbearance is a period of time during repayment in which a borrower is permitted to temporarily postpone making regular monthly payments. The debt is not forgiven, but regular payments are suspended until a later time. A forbearance agreement is most commonly applied to mortgages and student loans. However, forbearance is applicable to any type of loan. As an example, forbearance may be granted if a borrower is experiencing temporary financial difficulty. The consumer may be making reduced payments, interest-only payments or no payments.

If the account is in forbearance, report:

- Terms Duration = terms of the loan, which can be changed if the terms of the loan are extended
(If no payments are due during the forbearance period, blank fill.)
- Terms Frequency = frequency for payments due
(If no payments are due during the forbearance period, report code **D** for deferred.)
- Scheduled Monthly Payment Amount = new payment due
(If no payments are due during the forbearance period, zero fill.)
- Account Status = appropriate code that specifies the status of the account for each month the account is in forbearance (e.g., Current, 30 days delinquent, 60 days delinquent)
(If no payments are due during the forbearance period, report Account Status **11.**)
- Payment History Profile = appropriate code that specifies the previous month's Account Status for each month the account is in forbearance, plus prior history.
(Increment the Payment History Profile with value **D** if no payments are due during the forbearance period.)
- Special Comment Code = **CP** (Account in forbearance)
- Current Balance = outstanding balance amount, reflecting any payments made
- Amount Past Due = total amount that is 30 days or more past the due date, if the account is delinquent during the forbearance period
- K4 Specialized Payment Indicator = **02** and Deferred Payment Start Date when payments are deferred during the forbearance period

Important Note: Additionally, if the consumer was delinquent going into the forbearance period and no payments were required during forbearance, the two fields below must be considered when the consumer comes out of forbearance and begins repayment.

- Account Status Code = appropriate code that specifies the status of the account when the account comes out of forbearance
- Date of First Delinquency = if the Account Status is delinquent, the original date that led to the Account Status being reported, prior to forbearance

Frequently Asked Questions and Answers

46. Question: How should accounts that have been transferred be reported?

Answer: There are two options for reporting accounts that are being transferred internally or to a servicer:

1. **Preferred Option if account history can be verified by the new department or servicer:** Report the L1 Segment to change the Identification Number and/or the Consumer Account Number. Use of the L1 Segment allows the consumer reporting agencies to retain all prior account history.

Note: For full L1 Segment reporting details, refer to the L1 Segment field description in the Field Definitions module.

2. The second option results in two tradelines on a consumer's file: the first as transferred and the second for the ongoing account.

Report the following Base Segment fields as specified for the transferred account:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = the appropriate code that specifies the status of the account at the time of transfer
- Payment Rating = if applicable to the Account Status Code being reported
- Special Comment = For internal transfers, report Special Comment AT (Account closed due to transfer), **or** for transfers to another company or servicer, report Special Comment O (Account transferred to another company/servicer).
- Current Balance and Amount Past Due = zero
- Date of Account Information = date the account was transferred
Note: Reporting the account as transferred is considered a final disposition for credit reporting purposes. However, if the account is reported in subsequent reporting periods, freeze the Date of Account Information as of the date the account was transferred.
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of transfer, report the date of the first 30-day delinquency that led to the status being reported. If the account being transferred is current and included in bankruptcy, report the date of the bankruptcy petition or notification.
- Date Closed = date the account was transferred. If the account was closed prior to being transferred, report the original date the account was closed.
- Consumer Information Indicator = report bankruptcy indicator when applicable to the consumer(s)

Additionally, if the account is delinquent or derogatory, it is imperative that you provide the date of the first delinquency that led to the account being transferred to the internal department or servicer that will be reporting the ongoing account.

FAQ 46 continued on next page

Frequently Asked Questions and Answers

FAQ 46 (Option 2 continued)

In the following month's reporting period, report the following Base Segment fields as specified for the new account:

- Identification Number = number that identifies the new department or servicer reporting the account
- Consumer Account Number = new account number for the ongoing account
- Date Opened = date opened with the original department or servicer
- Account Status Code = appropriate code that specifies the status of the account as of the Date of Account Information
- Payment Rating = if applicable to the Account Status Code being reported
- Payment History Profile = report character 'B' for months the account was reported by the original department or servicer; do **not** report payment history that occurred prior to the transfer.
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of transfer, report the date of the first 30-day delinquency **with the original department or servicer** that led to the status being reported. If the account being transferred is current and included in bankruptcy, report the date of the bankruptcy petition or notification.

If the new department or servicer is unable to obtain the **Date of First Delinquency with the original department or servicer**, do not report the account.

- Consumer Information Indicator = report bankruptcy indicator when applicable to the consumer(s)

Note: If accounts are being transferred from one data processor to another, contact the data representative at each consumer reporting agency to facilitate transfer of the accounts.

Frequently Asked Questions and Answers

47. Question: How should accounts that have been sold to another company be reported?

Answer: Prior to reporting accounts that have been sold to another company, it is imperative that the data representative at each consumer reporting agency be contacted to discuss the various options and to facilitate a smooth transition. There are two options for reporting accounts that are sold to another company.

1. If the company that purchased the accounts will not report the prior history, the seller must report the accounts as sold to reflect the final status.

Report the following Base and K2 Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
 - Account Status Code = the appropriate code that specifies the status of the account at the time of the sale
 - Payment Rating = if applicable to the Account Status Code being reported
 - Special Comment = AH (Purchased by another company)
 - Current Balance and Amount Past Due = zero
 - Date of Account Information = date the account was sold
- Note:** Reporting the account as sold is considered a final disposition for credit reporting purposes. However, if the account is reported in subsequent reporting periods, freeze the Date of Account Information as of the date the account was sold.
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of sale, report the date of the first 30-day delinquency that led to the status being reported. If the account being sold is current and included in bankruptcy, report the date of the bankruptcy petition or notification.
 - Date Closed = date the account was sold to the other company. If the account was closed prior to being sold, report the original date the account was closed.
 - Consumer Information Indicator = report bankruptcy indicator when applicable to the consumer(s)
 - K2 Segment Purchased From/Sold To Indicator = 2 and Sold To Name = name of company to which the account was sold

Notes: To minimize consumer disputes, do not report accounts as sold that were previously reported as paid in full.

Additionally, if the account is delinquent or derogatory, it is imperative that you provide the date of the first delinquency that led to the account being sold **to the debt purchaser**.

2. If the company that purchased the accounts is converting the account history to their system, the seller should **not** report the accounts as sold. In this situation, the seller and purchaser should work together with the data representatives at the consumer reporting agencies, who will assist you with conversion of the accounts.

Frequently Asked Questions and Answers

48. Question: How should accounts that have been purchased from another company be reported?

Answer: Prior to reporting portfolio acquisitions, it is imperative that the data rep at each consumer reporting agency be contacted to discuss the various reporting options and to facilitate a smooth transition. Two possible options for reporting are:

1. If the lender who sold the accounts reported them as “purchased by another company” or the history cannot be verified for the account prior to purchase, report the following Base and K2 Segment fields as specified:

- Consumer Account Number = newly assigned account number
- Date Opened = date opened with the previous lender (**preferred**).
Note: If the date opened with the previous lender is not known, the date the account was purchased may be reported.
- Account Status Code = appropriate code that specifies the status of the account as of the Date of Account Information
- Payment Rating = if applicable to the Account Status Code being reported
- Payment History Profile = report character **B** for months when account was owned by the previous lender
- Date of Account Information = follow the standard guidelines documented in Field 24
Note: Reporting by the purchaser should begin in the following month’s reporting period – **after** the seller reported the accounts as sold.
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of purchase, report the date of the first 30-day delinquency **with the previous lender** that led to the status being reported. If the account is current and included in bankruptcy, report the date of the bankruptcy petition or notification.

Note: If the new lender is unable to obtain the **Date of First Delinquency with the original lender**, do not report the account.

- Consumer Information Indicator = report bankruptcy indicator when applicable to the consumer(s)
- K2 Segment Purchased From/Sold To Indicator = **1** and Purchased From Name = name of the company from which the account was purchased

Important Notes: Payment history that occurred with the previous lender, which is already on the consumer’s file, must not be reported by the new lender.

Do not report purchased accounts that were included in discharged/completed Bankruptcies.

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Frequently Asked Questions and Answers

FAQ 48 (continued)

2. If the previous lender's account history is being converted to the new lender's system and the account history can be verified, report the following Base, K2 Segment and L1 Segment fields as specified:

- Base Segment Identification Number = Identification Number reported by the previous lender
- Base Segment Consumer Account Number = Account Number reported by the previous lender
- Date Opened = date opened with the previous lender
- Account Status Code = appropriate code that specifies the status of the account as of the Date of Account Information
- Payment Rating = if applicable to the Account Status Code being reported
- Payment History Profile = report payment history provided by the previous lender
- Date of Account Information = follow the standard guidelines documented in Field 24

Note: Reporting by the purchaser should begin in the following month's reporting period.

- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of purchase, report the date of the first 30-day delinquency **with the previous lender** that led to the status being reported. If the account is current and included in bankruptcy, report the date of the bankruptcy petition or notification.

Note: If the new lender is unable to obtain the **Date of First Delinquency with the original lender**, do not report the account.

- Consumer Information Indicator = report bankruptcy indicator when applicable to the consumer(s)
- K2 Segment Purchased From/Sold To Indicator = **1** and Purchased From Name = name of the company from which the account was purchased
- L1 Segment Change Indicator = **3**, New Consumer Account Number = new account number assigned by the new lender, and New Identification Number = internal code that specifies where information will be verified by the new lender

Note: Do not report purchased accounts that were included in discharged/completed Bankruptcies.

Frequently Asked Questions and Answers

49. Question: How are “payment reversal” transactions handled when reporting Date of Last Payment, Date of First Delinquency, Payment History Profile and Actual Payment Amount?

Answer: A “payment reversal” transaction usually occurs when a check is returned for non-payment to the credit grantor. If the change is made in the following month’s reporting cycle, the following adjustments should be made:

- The Date of Last Payment should be adjusted to indicate the date of the last payment made that was not reversed.
- The FCRA Compliance/Date of First Delinquency (DOFD) should reflect the first time the consumer was 30 days past the due date that led to the status being reported. The DOFD would change to the month of the returned check if that had been the first time the consumer was 30 days past the due date.
- The Payment History Profile should reflect the appropriate delinquency in the first position, which reflects the previous month’s payment activity (e.g., **1** if the returned check resulted in the account being 30-59 days past the due date that month).
- The Actual Payment Amount reflects the payment received for this reporting period. If no payment was received for this reporting period, this amount should be zero.

50. Question: Consumer loans may have multiple payment schedules, which may each have different payment frequencies (e.g., principal amount due annually and interest amount due monthly). How should these loans be reported?

Answer: Report only one tradeline.

- The Terms Frequency should reflect the most frequent payment schedule. For example, if the principal is due annually and the interest amount is due monthly, report Terms Frequency **M** (Monthly).
- The Scheduled Monthly Payment Amount should reflect the minimum amount due each month and may change when the principal amount is also due.

In months where only the interest payment is due, report Special Comment Code **BT** (Principal deferred/interest payment only). In months where both principal and interest payments are due, the Special Comment Code **BT** should not be reported.

Frequently Asked Questions and Answers

51. Question: How should credit cards with no preset spending limits be reported that have terms allowing consumers to exceed the credit limits (i.e., Flexible Spending Credit Cards)?

Answer: Report the following Base Segment fields as specified:

- Account Type Code = 0G (Flexible Spending Credit Card)
- Portfolio Type = R (Revolving)
- Credit Limit = the valid credit limit for the revolving portion of the account
- Highest Credit or Original Loan Amount = the highest amount of credit utilized by the consumer
- Terms Duration = REV
- Scheduled Monthly Payment Amount = the minimum amount due based on the revolving balance, plus the total flexible amount if due in full, OR the minimum due based on the total outstanding balance
- Current Balance = outstanding balance amount, including revolving and flexible amounts
- Amount Past Due = the portion of the Scheduled Monthly Payment Amount based on the revolving and flexible amounts that is 30 days or more past the due date. (Do not include the current month's amount due in this field.)

Example 1 –

Flexible Spending Credit Cards with both Revolving and Open Terms:

A consumer has a credit card on which a \$10,000 credit limit is considered revolving, with a minimum due calculated as a small percentage of the revolving balance. Additionally, the consumer has no preset spending limit and the balance amount over \$10,000 must be paid in full each month. The current balance is \$12,000. The minimum due is 3% of \$10,000 plus the balance over the revolving amount (\$2,000). The Scheduled Monthly Payment Amount is \$2,300.

Example 2 –

Flexible Spending Credit Cards with only Revolving Terms:

A consumer has a credit card with a \$10,000 credit limit. Additionally, the consumer has no preset spending limit and can exceed the credit limit with no penalties or added fees. The minimum amount due is calculated as a percentage of the total balance amount. The current balance is \$12,000 and the percentage due is 3%. The Scheduled Monthly Payment Amount is \$360.

Frequently Asked Questions and Answers

52. Question: How should the different stages of foreclosure be reported?

Answer: Use the following guidelines:

Potential Foreclosure – No specific code is available with this designation. Continue reporting the correct Account Status Code that defines the current condition of the account. For example, Account Status Code 82 represents 120 – 149 days past the due date or Account Status Code 84 represents 180 days or more past the due date.

Foreclosure Started – Special Comment Code **BO** should be reported, which specifically says “Foreclosure proceedings started”. This special comment should be reported each month as long as the comment applies. The appropriate Account Status Code should be reported in conjunction with this special comment, such as Account Status Code 82 for 120 – 149 days past the due date.

Foreclosure Cancelled – No specific code is available for this situation. Therefore, if Special Comment Code BO had been reported, stop reporting the comment (i.e., blank out the Special Comment Code field) and the comment will be deleted from the consumer reporting agencies’ files.

Foreclosure Started / Now Paid – Account Status Code **65** should be reported when foreclosure proceedings had been started, but the consumer subsequently paid the account balance in full. Account Status 65 specifies “Account paid in full. A foreclosure was started”. The appropriate Payment Rating should be reported in conjunction with this Account Status.

Foreclosure Completed – Account Status Code **94** should be reported, which specifies “Foreclosure completed; there may be a balance due”. The appropriate Payment Rating should be reported in conjunction with this Account Status. Discontinue reporting Special Comment Code **BO** (Foreclosure proceedings started) at this point.

If the consumer is not responsible for the remaining balance on the account or there is no deficiency balance, report Account Status **94** and a Scheduled Monthly Payment Amount, Current Balance and Amount Past Due of zero. Report the Date Closed as the date the foreclosure was completed.

If the consumer is held responsible for the remaining balance on the account, continue reporting Account Status **94**. In each subsequent reporting period, increment the first position of the Payment History Profile with value **H** (Foreclosure completed). Report the remaining balance in the Current Balance and Amount Past Due fields, and as payments are made by the consumer, report a declining balance in both fields. When the Current Balance reaches zero, report the Date Closed as the date the account was paid in full.

For credit reporting purposes, do **not** report Account Status Code 97 (Charge-off) after Account Status 94 has been reported.

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Frequently Asked Questions and Answers

FAQ 52 (continued)

Redeemed Foreclosure – Account Status 65 should be reported, which specifies “Account paid in full. A foreclosure was started”. The appropriate Payment Rating should be reported in conjunction with this Account Status, along with a Current Balance and Amount Past Due = zero.

Note: Each state has a rescission period that allows the consumer to redeem the property during or after foreclosure.

Frequently Asked Questions and Answers

53. Question: How should alternatives to foreclosure (i.e., Deed in Lieu and Short Sale) be reported?

Answer: Use the following guidelines:

Deed in Lieu – Account Status Code **89** should be reported, which specifies “Deed received in lieu of foreclosure on a defaulted mortgage; there may be a balance due”. The appropriate Payment Rating should be reported in conjunction with this Account Status.

If the consumer is not responsible for the remaining balance on the account or there is no deficiency balance, report Account Status Code **89** and a Scheduled Monthly Payment Amount, Current Balance and Amount Past Due of zero. Report the Date Closed as the date the deed was received in lieu of foreclosure.

If the consumer is held responsible for the remaining balance on the account, continue reporting Account Status **89**. Report the remaining balance in the Current Balance and Amount Past Due fields, and as payments are made by the consumer, report a declining balance in both fields. When the Current Balance reaches zero, report the Date Closed as the date the account was paid in full. Note that the Payment History Profile field should contain 24 months of history the first time Account Status Code 89 is reported. In subsequent months, when Account Status 89 is reported, the entire Payment History Profile should be blank filled.

For credit reporting purposes, do **not** report Account Status Code 97 (Charge-off) after Account Status 89 has been reported.

Short Sale – A short sale occurs when the proceeds from the sale of real estate fall short of the balance owed on the loan. In a short sale, the lender agrees to discount the loan balance typically due to an economic or financial hardship on the part of the consumer.

Report the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Actual Payment Amount = the amount actually received for this reporting period
- Account Status Code = 13 (Paid or closed account/zero balance) or 65 (Account paid in full, a foreclosure was started), as applicable
- Payment Rating = applicable code that identifies whether the account is current or past due within the current month’s reporting period
- Special Comment = AU (Account paid in full for less than the full balance)
- Current Balance and Amount Past Due = zero
- Date of Account Information = the date the account was paid in full for less than the full balance
- Date Closed = the date the account was paid in full for less than the full balance

Frequently Asked Questions and Answers

54. Question: How should a secured account (i.e., mortgage, home equity or other secured account) be reported when the collateral is released but there is an outstanding balance due?

Answer: Continue to report the existing account with the following Base Segment fields as specified:

- Portfolio Type & Account Type = remain the same as previously reported
- Date Opened = the date the account was originally opened
- Original Loan Amount = the original amount of the loan
- Terms Duration = terms of the loan, which can be changed if the terms of the loan are extended
- Scheduled Monthly Payment Amount = new scheduled payment due
- Account Status Code = the applicable code that specifies how the consumer is paying the deficiency balance, such as current or delinquent
- Special Comment = CM (Collateral released by creditor/balance owing)
- Current Balance = outstanding balance amount, which may decline as payments are made
- Amount Past Due = total amount that is 30 days or more past the due date, if the account is delinquent

Note: When the consumer pays the outstanding balance in full, report the applicable “paid” Account Status Code, as well as the Payment Rating, if required. Discontinue reporting Special Comment CM. The Current Balance and Amount Past Due should be zero.

Frequently Asked Questions and Answers

55. Question: How should full loan assumptions be reported?

Answer: A Full Loan Assumption occurs when a new borrower (who has never been associated with the account) assumes responsibility for the loan. The original borrower is terminated from the loan and is no longer responsible for payments.

There are two options for reporting.

Note: Do not follow this FAQ when an existing borrower(s) is being terminated from an account, such as in a divorce situation. Instead, refer to FAQ 18 for reporting guidance.

1. If the Consumer Account Number remains the same for the consumer who is assuming the loan, the **consumers must be reported in separate reporting periods**.
 - The first month, report the original consumer(s) with ECOA Code **T** (Terminated) and Special Comment Code **H** (Loan assumed by another party). Report the Current Balance as zero.
 - The following month, report the new consumer(s). The Date Opened should be the date the loan was assumed by the new consumer(s). Other account information should be changed, if appropriate. For example, Terms Duration, Scheduled Monthly Payment, Current Balance or other fields may be different for the new consumer(s). Do **not** report the original consumer's account history in the Payment History Profile (Field 18).
2. If the consumer who is assuming the loan is given a new Consumer Account Number, follow these guidelines:
 - Report the original consumer(s) with ECOA Code **T** (Terminated) and Special Comment Code **H** (loan assumed by another party). Report the Current Balance as zero.
 - Report the new consumer(s) during the same month with the new Consumer Account Number, the Date Opened as the date the loan was assumed, and other appropriate account information. Do **not** report the original consumer's account history in the Payment History Profile (Field 18).

Frequently Asked Questions and Answers

56. Question: How should simple loan assumptions be reported?

Answer: A simple loan assumption is one in which the original borrower remains responsible for the loan in the event that the new borrower defaults.

Report the original loan for the original borrower with the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = applicable code that specifies the status of the account prior to the assumption
- Special Comment Code = AT (Account closed due to transfer)
- Current Balance and Amount Past Due = zero
- FCRA Compliance/Date of First Delinquency = if the account is delinquent at the time of the assumption, report the date of the first delinquency
- Date Closed = date the assumption process was completed

Report the assumed loan for the original and new borrower(s) with the following Base, J1 or J2 Segment fields as specified:

- Consumer Account Number = new or modified Account Number
Note: If the Account Number for the assumed loan remains the same, it must be modified for credit reporting purposes in order to be unique. For example, add a digit or character to the end of the original number.
- Date Opened = date the loan was assumed
- Highest Credit or Original Loan Amount = the amount that was assumed by the new borrower(s)
- Terms Duration/Terms Frequency/Scheduled Monthly Payment Amount = as applicable for the assumed loan
- Account Status Code = 11 (Current Account) for the first reporting period after the assumption. In subsequent reporting periods, the applicable code that specifies the status of the account as of the Date of Account Information.
- Payment History Profile = 'B' filled for the first reporting period after the assumption.
Note: Payment history that occurred prior to the assumption must not be reported on the assumed loan.
- ECOA Code for new borrower(s) = 7 (Maker)
- ECOA Code for original borrower = 5 (Guarantor)

57. Question: How should reverse mortgages be reported?

Answer: Do not report reverse mortgages because the consumer has no credit obligation.

Frequently Asked Questions and Answers

58. Question: What are the available options for reporting an account affected by a natural or declared disaster?

Answer: Use the following reporting guidelines after it is confirmed that an account is impacted by a natural or declared disaster, based on your internal policies and procedures.

There are two options for reporting **open accounts** – defined as Account Status Code 11 (Current account) or 71, 78, 80, 82, 83 or 84 (Delinquent accounts) – and **closed accounts with balances owing** - reported with the same open Account Status Codes.

1. Report the account as deferred, along with Special Comment **AW** (Affected by natural or declared disaster).

Per FAQ 44 (How should deferred loans be reported?), report the following Base Segment fields as specified:

- Terms Duration = blank
- Terms Frequency = D (Deferred)
- **Required for deferred accounts**
- Highest Credit or Original Loan Amount = the total amount borrowed
- Scheduled Monthly Payment Amount = zero
- Account Status Code = 11 (Current account)
- Payment History Profile = Use Character **D** for the months where payments are deferred.
- Current Balance = outstanding balance amount
- Amount Past Due = zero

If the Deferred Payment Start Date is known, report the K4 Segment with Specialized Payment Indicator **02** for Deferred Payment. Also, report the **Deferred Payment Start Date** as the date the first payment will be due. If the deferred payment start date is not known, do not report the K4 Segment.

Additionally, if the consumer was delinquent going into the deferment period, the two fields below must be considered when the consumer comes out of deferment and begins repayment.

- Account Status Code = appropriate code that specifies the status of the account when the account comes out of deferment
- Date of First Delinquency = if the Account Status is delinquent, the original date that led to the Account Status being reported prior to the deferment

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Frequently Asked Questions and Answers

FAQ 58 (continued)

2. Report the Account Status **that applies to the account** (credit grantor's decision). Report Special Comment **AW** (Affected by natural or declared disaster).

Derogatory Accounts – defined as Account Status Codes 88 (Government Claim), 89 (Deed in Lieu), 93 (Collection), 94 (Foreclosure Completed), 95 (Voluntary Surrender), 96 (Repossession), and 97 (Charge-off).

Continue reporting these statuses and add Special Comment **AW** (Affected by natural or declared disaster).

Debt Buyers and Collection Agencies

Continue reporting Account Status Code 93 (Collection) and add Special Comment **AW** (Affected by natural or declared disaster).

If accounts are sold to another company or given back to the original creditor, report Account Status Code **DA** to delete the accounts.

59. Question: How should deposit accounts, with overdraft protection, be reported that have been overdrawn?

Answer: These deposit accounts should only be reported when they are charged off or in collection activity. Report the following Base Segment fields as specified.

- Portfolio Type = 0 (Open)
- Account Type Code = 8B (Deposit Account with Overdraft Protection)
- Date Opened = date account opened
- Credit Limit = assigned overdraft limit
- Highest Credit/Original Loan Amount = highest overdrawn amount
- Terms Duration = 001
- Scheduled Monthly Payment Amount = zero fill
- Account Status Code = 93 (Collection), 97 (Unpaid balance reported as a loss – charge-off), 62 (Paid collection) or 64 (Account paid in full, was a charge-off)
- Current Balance = outstanding balance amount
- Amount Past Due = total amount that is 30 days or more past the due date
- Date of First Delinquency = date account was first overdrawn
- Date Closed = date the account was closed

Frequently Asked Questions and Answers

60. Question: How should prepaid credit cards/gift cards be reported?

Answer: Do not report prepaid credit cards/gift cards because the consumer has no credit obligation.

61. Question: How should an account be reported when it is included in a Personal Receivership plan (Wisconsin Chapter 128)?

Answer: Report the account per existing Metro 2® guidelines. If the Terms Duration and Scheduled Monthly Payment Amount were modified by the plan, report the new values. Include Consumer Information Indicator **1A** (Personal Receivership) for the consumer who filed the plan.

When the plan is completed or has been dismissed, report Consumer Information Indicator **Q** to remove the Personal Receivership indicator.

Frequently Asked Questions and Answers

62. Question: How should an account be reported when merchandise has been repossessed?

Answer: Use the following guidelines:

Account Status Code **96** should be reported, which specifies “Merchandise was repossessed; there may be a balance due”. Report the outstanding balance amount in the Current Balance field and the amount deemed to be past due by the creditor in the Amount Past Due field. Continue reporting Account Status 96 until one of the following situations apply:

- **If the consumer reinstates the loan** by bringing account payments current, report Account Status 11 (current) and continue reporting the account normally going forward.
- **If the consumer redeems the merchandise** by paying the account balance in full, report Account Status 63 (Account paid in full, was a repossession) and a Current Balance and Amount Past Due = zero.
- **If the consumer is not responsible** for the remaining balance on the account after the sale of the merchandise or there is no deficiency balance, report Account Status 96 with a Current Balance and Amount Past Due of zero. Report the Date Closed as the date the merchandise was repossessed.
- **If the consumer is held responsible** for the remaining balance on the account after the sale of the merchandise, continue reporting Account Status 96. Report the remaining balance in the Current Balance and Amount Past Due fields, and as payments are made by the consumer, report a declining balance in both fields. When the consumer pays the outstanding balance in full, report Account Status Code **63**, which specifies “Account paid in full, was a repossession”. The Current Balance and Amount Past Due should be zero and the Date Closed should be the date the account was paid in full.

Note: If a repayment plan is created for this remaining balance, report the new Scheduled Monthly Payment Amount (SMPA). Otherwise, report SMPA = zero.

If the remaining balance is not paid and is subsequently charged off, report Account Status Code 97 (Unpaid balance reported as a loss – charge-off). In subsequent reporting periods, follow FAQ 34. For credit reporting purposes, Account Status 97 should not be reported until after the sale of the merchandise and the consumer has been given an opportunity to make payments on the remaining balance.

Frequently Asked Questions and Answers

63. Question: How should an account be reported when the consumer has voluntarily surrendered the merchandise?

Answer: Use the following guidelines:

Account Status Code **95** should be reported, which specifies “Voluntary Surrender; there may be a balance due”, along with the applicable Payment Rating. Report the outstanding balance amount in the Current Balance field and the amount deemed to be past due by the creditor in the Amount Past Due field. If the consumer was current at the time of the voluntary surrender, the Amount Past Due should be zero and the FCRA Compliance/Date of First Delinquency should be the date the merchandise was voluntarily surrendered.

Continue reporting Account Status 95 until one of the following situations apply:

- **If the consumer reinstates the loan** by bringing account payments current, report Account Status **11** (current) and continue reporting the account normally going forward. Special Comment Code **AO** (Voluntarily surrendered – then redeemed or reinstated) may also be reported.
- **If the consumer redeems the merchandise** by paying the account balance in full, report Account Status **61** (Account paid in full, was a voluntary surrender) and a Current Balance and Amount Past Due = zero. Special Comment Code **AO** (Voluntarily surrendered – then redeemed or reinstated) may also be reported.
- **If the consumer is not responsible** for the remaining balance on the account after the sale of the merchandise or there is no deficiency balance, report Account Status **95** with a Current Balance and Amount Past Due of zero. Report the Date Closed as the date the consumer voluntarily surrendered the merchandise.

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Frequently Asked Questions and Answers

FAQ 63 (continued)

- **If the consumer is held responsible** for the remaining balance on the account after the sale of the merchandise, continue reporting Account Status **95**. Report the remaining balance in the Current Balance and Amount Past Due fields, and as payments are made by the consumer, report a declining balance in both fields.

Notes: If the consumer was current at the time the merchandise was voluntarily surrendered, the Amount Past Due would be zero. In subsequent months, if payments become delinquent, the Amount Past Due would be incremented based on the number of payments past due.

If a repayment plan is created for the remaining balance, report the new Scheduled Monthly Payment Amount (SMPA). Otherwise, report SMPA = zero.

When the consumer pays the outstanding balance in full, report Account Status Code **61**, which specifies "Account paid in full, was a voluntary surrender". The Current Balance and Amount Past Due should be zero and the Date Closed should be the date the account was paid in full.

If the remaining balance is not paid and is subsequently charged off, report Account Status Code 97 (Unpaid balance reported as a loss – charge-off). In subsequent reporting periods, follow FAQ 34. For credit reporting purposes, Account Status 97 should not be reported until after the sale of the merchandise and the consumer has been given an opportunity to make payments on the remaining balance.

Frequently Asked Questions and Answers

64. Question: How should a replacement credit card be reported (i.e., credit card replaced with a new account number)?

Answer: There are two options for reporting replacement credit cards:

1. **Preferred Option:** Report the L1 Segment to change the Consumer Account Number. Use of the L1 Segment allows the consumer reporting agencies to retain all prior account history and maintain one account.
2. The second option results in two tradelines on a consumer's file: the first as transferred and the second for the ongoing account.

Report the following Base Segment fields as specified for the transferred account:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = the appropriate code that specifies the status of the account at the time of transfer
- Special Comment = AT (Account closed due to transfer)
- Current Balance and Amount Past Due = zero
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of transfer, report the date of the first 30-day delinquency that led to the status being reported.
- Date Closed = date the account was transferred

In the following month's reporting period, report the new account with the new account number. Report the following Base Segment fields as specified for the new account with the new account number:

- Date Opened = date the original account was opened
- Account Status Code = the status of the account for the current month
- Payment History Profile = Report character **B** for months the account was reported with the original account number; do **not** report payment history that occurred prior to the replacement card being issued.
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time the card is replaced, report the date of the first 30-day delinquency that led to the status being reported.

Frequently Asked Questions and Answers

65. Question: How should an account be reported when the creditor files an IRS Form 1099-C?

Answer: The account should be reported as charged off, or if a settlement agreement was made with the consumer, the account should be reported as settled. Account balances should be reflective of those decisions or actions at the time they occur; e.g., charged off, settled. There is no special comment that specifically states that the creditor has filed form 1099-C.

If the account is reported as a charge off, report the following Base Segment fields:

- Account Status Code = 97 (Unpaid balance reported as a loss – charge-off)
- Current Balance and Amount Past Due:
 - If the consumer is no longer obligated to pay the balance, report both fields as zero.
 - If the account has received only a partial adjustment and the consumer remains obligated to repay the residual amount, report the residual amount in the Current Balance and Amount Past Due fields. If payments are made by the consumer, report the declining balance in these two fields.
- Original Charge-off Amount = the original amount charged to loss
- FCRA Compliance/Date of First Delinquency = the date of the first 30-day delinquency that led to the account being charged off

If the account is reported as settled, refer to FAQ 38 for reporting guidance.

Frequently Asked Questions and Answers

66. Question: How should timeshare mortgages and timeshare loans be reported?

Answer: If the timeshare account is a mortgage, report the account according to the Mortgage Portfolio Type guidelines. Report the following Base Segment fields as specified:

- Portfolio Type = M (Mortgage)
- Account Type Code = 26 (Conventional Mortgage) or 08 (Real Estate, specific type unknown), as applicable
- Terms Duration = number of years of the loan
- Account Status Code = 11, 13, 65, 71, 78, 80, 82-84, 89, 94, DA or DF, as applicable
- Payment Rating = applicable code when Account Status Code = 13, 65, 89 or 94
- Special Comment = Refer to Exhibit 6, Mortgage column, for applicable comments.
- Interest Type Indicator = F (fixed) or V (variable/adjustable)

If the timeshare account is a loan, report the account according to the Installment Portfolio Type guidelines. Report the following Base Segment fields as specified:

- Portfolio Type = I (Installment)
- Account Type Code = 0A (Timeshare)
- Terms Duration = number of months of the loan
- Account Status Code = 11, 13, 61-64, 71, 78, 80, 82-84, 93, 95-97, DA or DF, as applicable
- Payment Rating = applicable code when Account Status Code = 13 or 95
- Special Comment = Refer to Exhibit 6, Installment column, for applicable comments.

Frequently Asked Questions and Answers

67. Question: How should a modified loan be reported?

Answer: The guidelines described below are used for modified loans that are **not** associated with one of the federal loan modification programs.

Trial Period:

If there is a trial period prior to a loan being modified, report as follows during the trial period:

- Current, but eligible for loan modification:

If the consumer was current on his/her payments prior to the trial period, and makes each month's trial period payment on time, report the consumer as current (Account Status 11) during the trial period. If the consumer is at least 30 days past due during the trial period, report the Account Status Code that reflects the appropriate level of delinquency.

Report the trial period payment in the Scheduled Monthly Payment Amount field. Special Comment Code 'AC' (Paying under a partial payment agreement) should also be reported.

- Delinquent

If the consumer was delinquent (at least 30 days past the due date) prior to the trial period and the reduced payments do not bring the account current, report the Account Status Code that reflects the appropriate level of delinquency.

Report the trial period payment in the Scheduled Monthly Payment Amount field. Special Comment Code 'AC' (Paying under a partial payment agreement) should also be reported.

If the loan is not modified, report the account as per the original contractual agreement.

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Frequently Asked Questions and Answers

FAQ 67 (continued)

If the loan is modified, there are three options for reporting:

1. If the original Account Number and Date Opened are retained, report the amounts and terms as per the modified agreement. Fields that may be changed include Original Loan Amount, Terms Duration, Terms Frequency, Scheduled Monthly Payment Amount and Current Balance.

Note that the Terms Duration should reflect the terms for the life of the account. Therefore, for a loan modification, set the Terms Duration from the original Date Opened to the new maturity date.

Optional: Special Comment Code **CO** (Loan modified) may be reported. Note that this code is used when reporting accounts that are modified, but not under a federal government plan.

Special Comment **CO** may be reported as long as deemed appropriate by the data furnisher, or until another Special Comment becomes more critical. For the length of time the Special Comment should be reported, consult with your internal Legal or Compliance department.

2. If the original Account Number changes and the Date Opened remains the same, follow the above reporting guideline, and include an L1 Segment with the new Account Number. Refer to the L1 Segment specifications within the Field Definitions for reporting guidelines.
3. If the original Account Number and Date Opened change, report the original loan as specified:
 - Account Status Code = 13 (Paid)
 - Payment Rating = the appropriate code that identifies the status of the account within the current month's reporting period
 - Special Comment = AS (Account closed due to refinance)
 - Current Balance and Amount Past Due = zero

Report the newly modified loan with the new Account Number, new Date Opened and all other applicable fields. Payment history that occurred prior to the new Date Opened should not be reported with this account.

Note: For reporting guidelines specific to the federal loan modification programs, such as Making Home Affordable, Hope for Homeowners and the Fannie Mae/Freddie Mac Mortgage Loan Modification Program, refer to the module called "Mortgage Loan Modifications".

Frequently Asked Questions and Answers

68. Question: How should an account be reported when it is updated more than one time during a given monthly reporting period; e.g., an account that is moved to recovery?

Answer: Use the following guidelines to report accounts that are updated by the data furnisher more than one time during a given monthly reporting period:

- Date of Account Information = most recent date of update
- Account Status Code = new code that applies to the most recent update
- Payment History Profile = Freeze the PHP as it was reported in the first update of the monthly reporting period. In subsequent reporting periods, the PHP should be updated/incremented normally.

Example:

Regular Monthly Reporting Period:

- Date of Account Information = 03/05/2020
- Account Status = 82 (120-159 days past due date)
- Payment History Profile = 321000000110000210010000

Second Update in Same Reporting Period:

- Date of Account Information = 03/31/2020
- Account Status = 97 (Charge-off)
- Payment History Profile = 321000000110000210010000

Note: In order to accurately maintain the PHP, the field contents are the same as reported on 03/05/2020.

Next Monthly Reporting Period:

- Date of Account Information = 04/30/2020
 - Account Status = 97 (Charge-off)
 - Payment History Profile = L32100000011000021001000
- Note:** The PHP is updated/incremented normally at this point.

Frequently Asked Questions and Answers

69. Question: How should a debt extinguished under state law be reported?

Answer: Report the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = status at time of debt extinguishment
Note: The Account Status should not be 13 or 61-65.
- Special Comment Code = DE (Debt Extinguished Under State Law)
- Current Balance = zero
- Amount Past Due = zero

Note: After reporting Special Comment Code DE, discontinue reporting the account.

Glossary of Terms

Account Number Scrambling	A security feature that allows a data furnisher to report a scrambled version of the account numbers. Three methods of scrambling are available based on CDIA guidelines. The consumer reporting agencies will unscramble the account numbers for display purposes.
Affinity Name	An additional name that can be reported by Third Party Collection Agencies and Debt Buyers within the Original Creditor Name field in the K1 Segment. The Affinity Name further identifies or provides linkage detail for the relationship of the original creditor to any connecting or supporting entities (e.g., ABC BANK THE HOME STORE).
Alphanumeric	Describes a character set that includes both letters and numbers.
ASCII	An acronym for American Standard Code for Information Interchange. A code used by certain types of computers.
Authorized User	Person permitted by a credit card holder to charge goods and services on the cardholder's account. Authorized users are not legally responsible for payment of the charges incurred.
Automatic Stay	The filing of a bankruptcy, under any chapter of the Bankruptcy Code, stops most actions by any creditor against the debtor or the debtor's property. In Chapter 13, the stay even protects co-debtors (non-filers) who are liable with the debtor on consumer debts. The automatic stay gives the debtor protection from his creditors until the rights of all concerned can be balanced in bankruptcy court.
Bankruptcy Closed	A bankruptcy case may be closed or terminated when the consumer does not pay the applicable court fees or does not attend the required financial management class.
Bankruptcy Discharged	The judgment of the court that a person who has filed a Chapter 7, 11 or 12 petition be granted a bankruptcy. A Chapter 13 debtor is entitled to a discharge upon completion of all payments under the Chapter 13 plan.
Bankruptcy Dismissed	A Chapter 7, 11, 12 or 13 petition is terminated without the granting of a discharge by the U.S. Bankruptcy Court.

Glossary of Terms

Bankruptcy Petition (Chapter 7)	An application made to the U.S. Bankruptcy Court requesting release from financial obligations due to a debtor's inability to pay his debts.
Bankruptcy Petition (Chapter 11)	An application made to the U.S. Bankruptcy Court requesting financial reorganization.
Bankruptcy Petition (Chapter 12)	An application made to the U.S. Bankruptcy Court requesting release from financial obligations due to the inability of a family farm to pay their debts.
Bankruptcy Petition (Chapter 13)	An application made to the U.S. Bankruptcy Court requesting adjustment for personal debts and the establishment of a repayment plan.
Bankruptcy Withdrawn	The petitioner has decided not to file bankruptcy and has taken back the petition.
Blocking	Combining two or more records into a block to increase the efficiency of computer input and output operations.
Byte	One alphanumeric character.
Chapter 128	See Personal Receivership.
Consumer	One who buys goods or services.
Consumer Data Industry Association (CDIA)	CDIA is an international trade association representing the consumer credit, mortgage reporting, employment and tenant screening, and collection service industries. Headquartered in Washington, DC, CDIA provides legislative assistance and a lobbying function to its members, and establishes standards for the consumer credit reporting industry.
Cycle Reporting	A method by which data furnishers can divide their files for reporting purposes, usually in alphabetical order by surname or by billing date. Reporting takes place at the end of each billing cycle, resulting in more accurate and timely reporting of account statuses.
Debt Buyer	A company or individual who purchases accounts (generally non-performing debts) with the intent of collecting debts owed.
EBCDIC	An acronym for Extended Binary Coded Decimal Interchange Code. A code used by certain types of computers.

Glossary of Terms

ECOA (Equal Credit Opportunity Act)	A federal law that prohibits creditors from discriminating against applicants on the basis of sex or marital status in any aspect of a credit transaction.
ECOA Code	An alpha or numeric code used to describe a borrower's association with an account, according to the Equal Credit Opportunity Act (ECOA).
Factoring Company	See Debt Buyer.
FCBA (Fair Credit Billing Act)	A federal law stipulating procedures to help consumers resolve credit billing disputes with the credit grantor promptly and fairly. Disputes must be reported. The FCBA applies to open-end credit accounts, such as credit cards and revolving charge accounts.
FCRA (Fair Credit Reporting Act)	The FCRA states that companies which furnish data to the consumer reporting agencies have a responsibility to provide accurate information, to update and correct information and to respond to notices of dispute. It also states that consumers have the right to know what is in credit records; to challenge the accuracy of information; and to have it re-verified, updated or removed. It also limits the time derogatory information can be retained on a credit record and assures that a consumer's privacy will be protected at all times.
FDCPA (Fair Debt Collection Practices Act)	The FDCPA regulates the activities of debt collectors concerning their communications with consumers, prohibiting harassment or abuse, false or misleading representations, and unfair practices.
Fixed Length Record	<p>A record that always contains the same number of characters.</p> <p>For example, you may report a 426-byte Base Segment, a 100-byte J1 Segment, and a 30-byte K4 Segment for every record. The fixed record length would be 556. If there is no associated consumer on the account, report the Base Segment, report the J1 Segment Identifier, blank fill the remainder of the J1 Segment, and report the K4 Segment information.</p>
Fixed Rate Loan	A loan in which the interest rate does not change during the entire term of the loan.

Glossary of Terms

Flexible Spending Credit Card

Credit card with no preset spending limit. The credit card has a Credit Limit, but the terms of the card allow the consumer to exceed that amount. Refer to Frequently Asked Question 51 for reporting guidelines.

Forbearance

A period of time during repayment in which a borrower is permitted to temporarily postpone making regular monthly payments. The debt is not forgiven, but payments are suspended until a later time. As an example, forbearance may be granted if a borrower is experiencing temporary financial difficulty. A forbearance agreement is most commonly applied to mortgages and student loans. However, forbearance is applicable to any type of loan. Refer to Frequently Asked Question 45 for reporting guidelines.

Installment (Portfolio Type)

A loan repayable in installments, usually in set monthly amounts.

Lease Assumption

The debtor's assumption of personal liability for leases of personal property that would otherwise be discharged in bankruptcy. When a lease is assumed, the consumer is assuming use of the personal property, such as an auto, as well as payment on the account.

Line of Credit (Portfolio Type)

An agreement between an institution and a consumer where the institution agrees to lend a consumer funds up to an agreed upon credit limit. The consumer may borrow as much of the line as needed and pays interest on the borrowed portion only. Payment amounts are revolving, based on the outstanding balance amount.

Loan Assumption

Full Loan Assumption – A new borrower assumes responsibility for a loan. The original borrower is terminated from the loan and is no longer responsible for payments. Refer to Frequently Asked Question 55 for reporting guidelines.

Simple Loan Assumption – A new borrower assumes responsibility for a loan. The original borrower remains responsible in the event that the new borrower defaults. Refer to Frequently Asked Question 56 for reporting guidelines.

Glossary of Terms

Mortgage (Portfolio Type)	A written conveyance of title (i.e., contract or deed) to real estate property. The creditor has actual title to the property, but the property remains with the use and occupancy of the borrower as long as the conditions of the mortgage are met.
Open (Portfolio Type)	Accounts where the entire balance is due upon demand or that have one payment due as scheduled (i.e., Terms Duration = 001). This Portfolio Type is used by credit card reporters when the full balance amount is due each month (i.e., no revolving terms). This Portfolio Type is also used by Collection Agencies, Child Support Agencies, Debt Buyers, Student Loan Guarantors, the U.S. Department of Education (as guarantor) and Utility Services' payment plans.
Personal Receivership	A voluntary debt repayment plan filed in Wisconsin (Chapter 128) that is an alternative to Bankruptcy. The consumer may include debts they want managed by the court. The plan is administered by a court-appointed trustee and lasts for a period of time no more than three years. Refer to Frequently Asked Question 61 for reporting guidelines.
Reaffirmation of Debt (Bankruptcy Chapter 7)	An agreement by a debtor to continue paying a dischargeable debt after the bankruptcy, usually for the purpose of keeping collateral or mortgaged property that would otherwise be subject to repossession. This agreement is done through the U.S. Bankruptcy Court.
Reaffirmation of Debt Rescinded (Bankruptcy Chapter 7)	The consumer may rescind a reaffirmation agreement prior to the bankruptcy discharge or within 60 days after the reaffirm agreement is filed with the court, whichever occurs later. A consumer files a "rescind of debt" (requires judge's signature) for one or more of the debts in the reaffirm. This means that the reaffirm is canceled (taken back) and the debts are again included in or discharged through bankruptcy.
Redeemed	When merchandise is repossessed or foreclosure is started on property, the consumer can "redeem" the merchandise or property by paying the debt in full.

Glossary of Terms

**Redemptions
(due to Bankruptcy)**

In a Bankruptcy filing, the consumer can choose to redeem merchandise from a creditor by paying fair market value. Refer to Frequently Asked Question 31 for reporting guidelines.

Reinstated

When merchandise is repossessed or to avoid foreclosure, the consumer can “reinstate” the loan by bringing account payments current; i.e., making up all late payments, including applicable fees and late charges.

Relief from Stay

A bankruptcy judge grants a secured creditor the right to collect a debt that has been included in bankruptcy, to the extent that the order permits.

**Revolving
(Portfolio Type)**

An account that establishes a maximum credit limit for a consumer, such as a credit card or charge account. Payment amounts are revolving based on the outstanding balance amount.

Short Sale

The sale of real estate in which the proceeds from the sale fall short of the balance owed on the loan, which is secured by the property sold. In a short sale, the lender agrees to discount the loan balance, typically due to an economic or financial hardship on the part of the consumer.

Standard

The term “standard” appears in the Credit Reporting Resource Guide® (CRRG®) and other training materials associated with the Metro 2® Format. When used in the CRRG® or other Metro 2® training materials, the term “standard” refers to the formatting instructions that guide furnishers to report information to the consumer reporting agencies that accept data in the Metro 2® Format. The term also refers to the information fields and codes that are intended to promote consistent reporting of information about consumers to the consumer reporting agencies that accept data in the Metro 2® Format.

Entities furnishing data in the Metro 2® Format are responsible for furnishing data that they believe will satisfy their obligations in compliance with relevant laws. Neither the Metro 2® Task Force nor CDIA is responsible for determining whether a particular furnisher has satisfied its obligations to accurately report information.

Glossary of Terms

Third Party Collection Agency

A company or individual who specializes in collecting outstanding debts for other businesses or individuals.

Variable/Adjustable Rate Loan

A loan in which the interest rate is periodically adjusted based on a variety of indices, usually in response to changes in the Treasury Bill rate or the prime rate.

Variable Length Records

Records which may be different lengths within predetermined minimums and maximums. Variable length records allow a data furnisher to report only the size of record required for a transaction, thus allowing more data to be placed on the media.

For example, the J1 and J2 Segments would be reported only when additional borrowers are associated with an account. Some records may include these appendages, while others may not.

Validation/Implementation Checklist

CHECKLIST USES

This valuable checklist may be used for many purposes, including:

- Self-auditing tool to ensure accuracy and integrity of your data
- Validating that your Metro 2[®] output is still accurate when changes are made to your internal systems
- Upgrading your existing Metro 2[®] Format program
- Developing new Metro 2[®] software

The 2010 FACT Act Data Furnisher rules state that “each furnisher must review its policies and procedures periodically and update them as necessary to ensure their continued effectiveness”. The checklist can help you with this validation process.

IMPLEMENTATION OF THE METRO 2[®] FORMAT

When used to implement a new Metro 2[®] program or to change from Metro[™] to Metro 2[®], this checklist will guide you step by step through the process.

Prior to reporting in Metro 2[®] for the first time, you must complete testing with each of the consumer reporting agencies to which you report.

Whether reporting through a purchased software package, a third-party data processor or an internally developed program, the data furnisher is ultimately responsible for compliance issues.

When reporting information through a third-party processor, there are certain steps that need to be taken to ensure that information is reported according to industry standard guidelines. The steps are:

- Confirm that the processor is supplying all account information in the Metro 2[®] Format to all consumer reporting agencies.
- Use the Metro 2[®] Validation/Implementation Checklist to review in detail what the processor will be reporting to ensure that your portfolio information is reported accurately.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
1	Obtain a copy of the Metro 2® Format. <i>Electronically:</i> https://www.cdiaonline.org/resources/furnishers-of-data-overview/metro2-information/ <i>Hard copy:</i> https://www.cdiaonline.org/publications/			
2	Obtain a Program Identifier (for the Header Record) from each consumer reporting agency.			
3	Compare Metro 2® Field Definitions to available data on your system. The following data should be reported according to the specified definitions in order to process your credit information correctly:	<i>Credit Reporting Resource Guide®: Metro 2®</i>		
	Header Record - Identification of Reporter:			
	Block Descriptor Word (BDW)	Page 4-1		See FAQ 8.
	Record Descriptor Word (RDW)	Page 4-1		See FAQ 9.
	Record Identifier - HEADER	Page 4-1	Hard code	
	Cycle Identifier	Page 4-2		See FAQ 11.
	Innovis Program Identifier	Page 4-2	Hard code	
	Equifax Program Identifier	Page 4-2	Hard code	
	Experian Program Identifier	Page 4-2	Hard code	
	TransUnion Program Identifier	Page 4-2	Hard code	
	Activity Date	Page 4-2		
	Date Created	Page 4-2		
	Program Date	Page 4-2		

Note: References to FAQ numbers can be found in the Frequently Asked Questions and Answers section.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	Program Revision Date	Page 4-3		
	Reporter Name	Page 4-3		
	Reporter Address	Page 4-3		
	Reporter Telephone Number	Page 4-3		
	Software Vendor Name	Page 4-3	Hard coded by Vendor	
	Software Version Number	Page 4-3	Hard coded by Vendor	
	Base Segment - Processing Information:			See FAQ 1.
	Block Descriptor Word (BDW)	Page 4-4		See FAQ 8.
	Record Descriptor Word (RDW)	Page 4-4		See FAQ 9.
	Processing Indicator	Page 4-4	Hard code	
	Time Stamp	Page 4-5		
	Base Segment - Account Information:			
	Identification Number	Page 4-5		
	Cycle Identifier	Page 4-5		See FAQ 11.
	Consumer Account Number	Page 4-5		
	Portfolio Type	Page 4-6		
	Account Type	Page 4-6		See Exhibits 1 & 2.
	Date Opened	Page 4-6		
	Credit Limit	Page 4-7		
	Highest Credit or Original Loan Amount	Page 4-7		
	Terms Duration	Page 4-8		See Exhibit 3.
	Terms Frequency	Page 4-8		See Exhibit 3.
	Scheduled Monthly Payment Amount	Page 4-9		See Exhibit 3.
	Actual Payment Amount	Page 4-9		
	Account Status	Page 4-10		See FAQs 12 & 41 and Exhibit 4.
	Payment Rating	Page 4-10		See FAQ 12.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	Payment History Profile (up to 24 months)	Page 4-11		See FAQs 22 & 41 and Exhibit 5.
	Special Comment	Page 4-12		See FAQ 12 and Exhibits 6 & 7.
	Compliance Condition Code	Page 4-13		See Exhibit 8.
	Current Balance	Page 4-14		
	Amount Past Due	Page 4-14		
	Original Charge-off Amount	Page 4-14		
	Date of Account Information	Page 4-15		
	FCRA Compliance/Date of First Delinquency	Page 4-16		See FAQ 22 and Exhibit 9.
	Date Closed	Page 4-17		
	Date of Last Payment	Page 4-17		
	Interest Type Indicator	Page 4-17		
	Base Segment - Primary Borrower Information:			
	Surname	Page 4-18		Include edits to remove internal messages.
	First Name	Page 4-18		
	Middle Name	Page 4-19		
	Generation Code	Page 4-19		
	Social Security Number	Page 4-19		
	Date of Birth	Page 4-20		
	Telephone Number	Page 4-20		
	ECOA Code	Page 4-20		See FAQs 13, 14, 16 & 18 through 20 and Exhibit 10.
	Consumer Information Indicator	Page 4-21		See FAQs 23 through 32 & 61 and Exhibit 11.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	Country Code	Page 4-21		See Exhibit 12.
	First Line of Address	Page 4-22		See Exhibit 13. Include edits to remove internal messages.
	Second Line of Address	Page 4-22		
	City	Page 4-22		
	State	Page 4-23		See Exhibit 14.
	Postal/Zip Code	Page 4-23		
	Address Indicator	Page 4-23		
	Residence Code	Page 4-23		
4	Can you report all borrowers associated with the account?			
	For an associated borrower who lives at the same address as the primary borrower, report the J1 Segment. Fields available:			See FAQs 3, 6, 7 & 17.
	Segment Identifier - J1	Page 4-24	Hard code	
	Surname	Page 4-24		Include edits to remove internal messages.
	First Name	Page 4-25		
	Middle Name	Page 4-25		
	Generation Code	Page 4-25		
	Social Security Number	Page 4-26		
	Date of Birth	Page 4-26		
	Telephone Number	Page 4-27		
	ECOA Code	Page 4-27		See FAQs 13, 14, 16, 18 & 19 and Exhibit 10.
	Consumer Information Indicator	Page 4-28		See FAQs 23 through 32 & 61 and Exhibit 11.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	For an associated borrower who lives at a different address than the primary borrower, report the J2 Segment. Fields available:			See FAQs 3, 6, 7 & 17.
	Segment Identifier - J2	Page 4-29	Hard code	
	Surname	Page 4-29		Include edits to remove internal messages.
	First Name	Page 4-30		
	Middle Name	Page 4-30		
	Generation Code	Page 4-30		
	Social Security Number	Page 4-31		
	Date of Birth	Page 4-32		
	Telephone Number	Page 4-33		
	ECOA Code	Page 4-33		See FAQs 13, 14, 16 & 18 through 20 and Exhibit 10.
	Consumer Information Indicator	Page 4-34		See FAQs 23 through 32 & 61 and Exhibit 11.
	Country Code	Page 4-34		See Exhibit 12.
	First Line of Address	Page 4-35		See Exhibit 13. Include edits to remove internal messages.
	Second Line of Address	Page 4-35		
	City	Page 4-35		
	State	Page 4-36		See Exhibit 14.
	Postal/Zip Code	Page 4-36		
	Address Indicator	Page 4-36		
	Residence Code	Page 4-36		

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
5	For Collection Agencies, Debt Buyers, Check Guarantee Companies, Student Loan Guaranty Agencies, and U.S. Department of Education, a K1 Segment is needed. Fields available:			The K1 Segment is required for these companies.
	Segment Identifier - K1	Page 4-37	Hard code	
	Original Creditor Name	Page 4-38		
	Creditor Classification	Page 4-39		
6	If you've purchased or sold an account, a K2 Segment can be reported. Fields available:			See FAQs 47 & 48.
	Segment Identifier - K2	Page 4-40	Hard code	
	Purchased From/Sold To Indicator	Page 4-40		
	Purchased From or Sold To Name	Page 4-40		
7	If you provide mortgage information, a K3 Segment can be reported. Fields available:			
	Segment Identifier - K3	Page 4-41	Hard code	
	Agency Identifier	Page 4-41		
	Account Number (of secondary marketing agency)	Page 4-41		
	Mortgage Identification Number	Page 4-41		
8	Specialized payment information, for balloon or deferred payments, can be reported in the K4 Segment. Fields available:			
	Segment Identifier - K4	Page 4-42	Hard code	
	Specialized Payment Indicator	Page 4-42		
	Deferred Payment Start Date	Page 4-42		See FAQ 44.
	Balloon Payment Due Date	Page 4-42		
	Balloon Payment Amount	Page 4-42		

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
9	Account Number and/or Identification Number changes can be reported in the L1 Segment. Fields available:			See FAQ 5.
	Segment Identifier - L1	Page 4-43	Hard code	
	Change Indicator	Page 4-43		
	New Consumer Account Number	Page 4-43		
	New Identification Number	Page 4-44		
10	Can employment information for the primary borrower be provided in the N1 Segment? Fields available:			
	Segment Identifier - N1	Page 4-45	Hard code	
	Employer Name	Page 4-45		
	First Line of Employer Address	Page 4-45		
	Second Line of Employer Address	Page 4-45		
	Employer City	Page 4-45		
	Employer State	Page 4-45		
	Employer Postal/Zip Code	Page 4-45		
	Occupation	Page 4-46		
11	Can totals be provided in the Trailer Record? Fields available:			
	Record Descriptor Word (RDW)	Page 4-47		See FAQ 9.
	Record Identifier - TRAILER	Page 4-47	Hard code	
	Total Base Records	Page 4-47		
	Total of Status Code DF (Delete due to fraud)	Page 4-47		
	Total Associated Consumer Segments (J1)	Page 4-47		
	Total Associated Consumer Segments (J2)	Page 4-47		
	Block Count	Page 4-47		
	Total of Status Code DA (Delete – other than fraud)	Page 4-47		
	Total of each Status Code individually	Pages 4-47 through 4-49		
	Total of ECOA Code Z (Delete borrower)	Page 4-49		
	Total Employment Segments	Page 4-49		
	Total Original Creditor Segments	Page 4-49		

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	Total Purchased From/Sold To Segments	Page 4-49		
	Total Mortgage Information Segments	Page 4-49		
	Total Specialized Payment Information Segments	Page 4-49		
	Total Change Segments	Page 4-49		
	Total SSNs (All Segments)	Page 4-50		
	Total SSNs (Base Segments)	Page 4-50		
	Total SSNs (J1 Segments)	Page 4-50		
	Total SSNs (J2 Segments)	Page 4-50		
	Total Dates of Birth (All Segments)	Page 4-50		
	Total Dates of Birth (Base Segments)	Page 4-50		
	Total Dates of Birth (J1 Segments)	Page 4-50		
	Total Dates of Birth (J2 Segments)	Page 4-50		
	Total Telephone Numbers (All Segments)	Page 4-50		
12	<i>Review the following reporting situations:</i>			
	How should returned checks be reported to comply with the Fair Credit Reporting Act?			See FAQ 15.
	How can an account, or specific borrower, be deleted from the file?			See FAQ 16.
	What causes duplicate tradelines?			See FAQ 21.
	If you are a first time reporter of credit data, there are special reporting requirements.			See FAQ 22.
	How should an account be reported when the consumer files bankruptcy, but the account is not included in the bankruptcy?			See FAQ 23.
	How should an account included in bankruptcy be reported if a "Relief from Stay" is granted to the creditor?			See FAQ 24.
	How should an account that has been included in Bankruptcy be reported when a consumer is making payments or has paid the account in full, even though the account has not been reaffirmed?			See FAQ 25.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	How do you report accounts that are completely or partially reaffirmed in bankruptcy?			See FAQ 26.
	How should an account be reported when one or more borrowers filed Bankruptcy Chapter 7 or 11?			See FAQs 27(c) and 27(d).
	How should an account be reported when one or more borrowers filed Bankruptcy Chapter 12 or 13?			See FAQs 28(c) and 28(d).
	How should a secured debt (e.g., mortgage account) be reported when a consumer completes the required payments through a Bankruptcy Chapter 12 or 13 plan, but the account is still open and the consumer is continuing to make payments?			See FAQ 29.
	How should multiple bankruptcies (i.e., the same or different chapters) be reported for the different associated borrowers on an account?			See FAQ 30.
	How should Bankruptcies be reported when the consumer voluntarily surrenders or redeems the merchandise?			See FAQ 31.
	How should an account be reported when a Bankruptcy case has been closed or terminated without being discharged or dismissed?			See FAQ 32.
	When and how should Debit Cards be reported?			See FAQ 33.
	How should charge-offs and paid charge-offs be reported?			See FAQs 34(a) & 34(b).
	If a credit card is temporarily unavailable for use because the credit grantor is conducting an investigation, how should the account be reported?			See FAQ 35.
	How should an account be reported when an auto lease is paid in full, yet there are over mileage charges, excess wear and tear charges, or other outstanding charges on the account?			See FAQ 36.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	How should an account be reported when an auto lease is prepaid – where entire lease payment is paid at the time of opening?			See FAQ 37.
	How should accounts that are paid in full for less than the full balance (i.e., settled) be reported?			See FAQ 38.
	How should paid in full, closed accounts be reported?			See FAQ 39.
	How should a closed account be reported that has an outstanding balance?			See FAQ 40.
	How long should paid accounts (Account Status Codes 13, 61-65) continue to be reported?			See FAQ 41.
	How should a renegotiated/refinanced loan be reported?			See FAQ 42.
	How should lost or stolen credit cards be reported?			See FAQ 43.
	How should deferred loans be reported?			See FAQ 44.
	How should accounts in forbearance be reported?			See FAQ 45.
	How should accounts that have been transferred be reported?			See FAQ 46.
	How should accounts that have been sold to another company be reported?			See FAQ 47.
	How should accounts that have been purchased from another company be reported?			See FAQ 48.
	How are "payment reversal" transactions handled?			See FAQ 49.
	How do you report loans with multiple payment schedules?			See FAQ 50.
	How should credit cards with no preset spending limits be reported that have terms allowing consumers to exceed the credit limits?			See FAQ 51.
	How should the different stages of foreclosure be reported?			See FAQ 52.
	How should alternatives to foreclosure (i.e., Deed in Lieu and Short Sale) be reported?			See FAQ 53.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	How should a secured account (i.e., mortgage, home equity or other secured account) be reported when the collateral is released but there is an outstanding balance due?			See FAQ 54.
	How should full loan assumptions be reported?			See FAQ 55.
	How should simple loan assumptions be reported?			See FAQ 56.
	How should reverse mortgages be reported?			See FAQ 57.
	How should an account be reported when the consumer is affected by a natural or declared disaster?			See FAQ 58.
	How should prepaid credit cards/gift cards be reported?			See FAQ 60.
	How should an account be reported when it is included in a Personal Receivership plan (Wisconsin Chapter 128)?			See FAQ 61.
	How should an account be reported when merchandise has been repossessed?			See FAQ 62.
	How should an account be reported when the consumer has voluntarily surrendered the merchandise?			See FAQ 63.
	How should a replacement credit card be reported (i.e., credit card replaced with a new account number)?			See FAQ 64.
	How should an account be reported when the creditor files an IRS Form 1099-C?			See FAQ 65.
	How should timeshare mortgages and timeshare loans be reported?			See FAQ 66.
	How should a modified loan be reported?			See FAQ 67.
	How should an account be reported when it is updated more than one time during a given monthly reporting period; e.g., an account that is moved to recovery?			See FAQ 68.
	How should a debt extinguished under state law be reported?			See FAQ 69.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	COMMENTS
13	<i>Include the following cross-field edits:</i>		
	Portfolio Type / Account Type	See Exhibit 2.	
	Portfolio Type / Credit Limit	See Base Segment Field 11.	
	Portfolio Type / Highest Credit or Original Loan Amount	See Base Segment Field 12.	
	Portfolio Type / Account Type / Terms Duration	See Base Segment Field 13 & Exhibit 2.	
	Terms Duration / Terms Frequency / Scheduled Monthly Payment Amount	See Exhibit 3.	
	Date Opened / Payment History Profile		Amount of history reported should not be older than the Date Opened.
	Date of Account Information / Account Status		Account Status is reported "as of" the Date of Account Information.
	Date of Account Information/Payment History Profile (PHP)		First position of PHP represents reporting period prior to Date of Account Information.
	Account Status / Payment Rating	See Base Segment Fields 17A & 17B.	
	Account Status / Current Balance / Amount Past Due		Monetary fields should be validated based on the status reported. Examples: <ul style="list-style-type: none"> Account Status 11 (Current) requires Amount Past Due = 0. Account Status 13 (Paid account) requires Current Balance and Amount Past Due = 0.
	Date of First Delinquency / Account Status / Payment Rating / Consumer Information Indicator	See Base Segment Field 25 or Exhibit 9.	
	Charge-off and Paid Charge-off Account Status / Original Charge-off Amount		Original Charge-off Amount is required for Account Statuses 97 and 64.
	Paid or Sold Account / Current Balance/ Date Closed	See FAQs 38, 39 & 47.	Date Closed is required and Current Balance = 0.
	Closed Special Comments or Compliance Condition Codes/ Date Closed		Date Closed is required.
	ECOA Codes when Multiple Borrowers	See Exhibit 10.	

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	<i>Project Phases:</i>			
14	Review the Metro 2® Format and any conversion questions with your consumer reporting agency representative.	Exhibit 15: Data Conversion Checklist		
15	Determine whether data will be reported in the Character or Packed Format.			Character Format is preferred.
16	Develop internal software, and perform internal conversion tests.			
17	To set-up for electronic transmissions, which is the preferred method of reporting, contact all consumer reporting agencies.			
18	Advise all consumer reporting agencies of the expected date they will receive the test transmission or media.			
19	Send test transmission, record layout, and documentation to ALL consumer reporting agencies.			
20	Make corrections to your credit reporting format and data, as required.			
21	Send transmission to all consumer reporting agencies.			

Child Support Reporting

GENERAL REPORTING GUIDELINES

The Child Support Enforcement Program was established in 1975 under Title IV-D of the Social Security Act, to help state and local agencies locate absent parents and to collect child support from parents legally obligated to pay.

Child support obligations are renewable from month to month. Although each monthly payment satisfies that month's obligation, the next month immediately begins a new obligation, to be satisfied by the next payment. The entire support obligation is not considered satisfied until the child reaches the age of majority or emancipation, or the statute of limitations for that state has been reached.

- Report data in the standard Metro 2® Format, including the Header Record.
- Report full file on a monthly basis.
- Report the complete name, social security number, date of birth, and address of the obligor.
- Report the telephone number, when available.
- An acceptable reason for deleting accounts is when Child Support cases are withdrawn by the courts.
- In the Identification Number field, report the internal code that identifies the child support agency where the information is verified.
- All parties reporting credit information must comply with the Fair Credit Reporting Act and any applicable state laws.
- All parties reporting credit information must respond to consumer inquiries.

Note: The guidelines contained in this document are specific to your industry and should be used in conjunction with the specifications in the Metro 2® Format. Refer to the Metro 2® Format for detailed information on segments and field information.

CHILD SUPPORT REPORTING GUIDELINES

1. State agencies **that are able to age the accounts** should report the following Account Status Codes (Base Segment, Field 17A):

Status 11

Reported for all open, current accounts, and for cases that have been brought current. Use this status when the child, or youngest child (in the case of multiple children), has **not** yet reached the age of majority or emancipation, or the statute of limitations for judgments in that state has not been reached.

Status 13¹

Reported when the Office of Child Support Enforcement rates this case "satisfied." Use this status when the child, or youngest child (in the case of multiple children), **has** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Status 62

Reported when the Office of Child Support Enforcement rates this case as "satisfied" and the account was previously a collection. Use this status when the child, or youngest child (in the case of multiple children), **has** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Statuses 71, 78, 80, 82-84²

Reported to reflect the appropriate stage of delinquency (30 days to 180 or more days past the due date).

Status 93²

Reported when the Office of Child Support Enforcement rates this case as in collections.

Status DA

Reported when a Child Support case is withdrawn by the courts. The action taken by the consumer reporting agencies is to delete the account from their files.

Note: When the child support case is transferred to another state because of the relocation of the obligor, follow the standard guidelines in Frequently Asked Question and Answer 46 (option 2 with Special Comment O – transferred to another company/servicer). This transfer usually occurs with a URESA (Uniform Reciprocal Enforcement Support Act) account. The state agency is responsible for notifying another agency when the account is being transferred to their jurisdiction.

Report the Payment History Profile, which provides up to 24 months of payment history, in order for the agency to control and maintain the payment history.

¹ When the Account Status is 13, the Payment Rating must also be reported.

² When Status 71, 78, 80, 82-84 or 93 is reported, the account should be reported with a Special Comment "CS" each month in order to overlay the date of first delinquency. Special Comment "CS" is reported only until the child or youngest child reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

CHILD SUPPORT REPORTING GUIDELINES

State agencies ***that are unable to age the accounts*** should report the following Account Status Codes (Base Segment, Field 17A):

Status 11

Reported for all open, current accounts, and for cases that have been brought current. Use this status when the child, or youngest child (in the case of multiple children), has ***not*** yet reached the age of majority or emancipation, or the statute of limitations for judgments in that state has not been reached.

Status 13¹

Reported when the Office of Child Support Enforcement rates this case "satisfied" and the account was previously reported as current. Use this status when the child, or youngest child (in the case of multiple children), ***has*** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Status 62

Reported when the Office of Child Support Enforcement rates this case "satisfied" and the account was previously a collection. Use this status when the child, or youngest child (in the case of multiple children), ***has*** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Status 93

Reported when the Office of Child Support Enforcement rates this case as in collections. If a Status 93 is reported, the account should be reported with a Special Comment "CS" each month in order to overlay the date of first delinquency. Special Comment "CS" is reported only until the child or youngest child reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Status DA

Reported when a Child Support case is withdrawn by the courts. The action taken by the consumer reporting agencies is to delete the account from their files.

Note: When the child support case is transferred to another state because of the relocation of the obligor, follow Frequently Asked Question and Answer 46 (option 2 with Special Comment O – transferred to another company/servicer). This transfer usually occurs with a URESA (Uniform Reciprocal Enforcement Support Act) account. The state agency is responsible for notifying another agency when the account is being transferred to their jurisdiction.

¹ When the Account Status is 13, the Payment Rating must also be reported.

CHILD SUPPORT REPORTING GUIDELINES

2. Portfolio Type (Base Segment, Field 8) — O (Open)
3. Account Type Codes (Base Segment, Field 9)
 - 50 – Family Support
 - 93 – Child Support
4. Date Opened (Base Segment, Field 10) — the date the case was initiated with the state agency
5. Highest Credit or Original Loan Amount (Base Segment, Field 12) — zero
6. Terms Duration (Base Segment, Field 13) — 001
7. Scheduled Monthly Payment Amount (Base Segment, Field 15) — the monthly debt obligation of the obligor
8. Special Comment Codes (Base Segment, Field 19) — Any Special Comment Code can be reported on accounts that do not require Special Comment Code CS or O.

Refer to Exhibits 6 and 7 in the Metro 2® Format for descriptions of Special Comment Codes.

9. Compliance Condition Codes (Base Segment, Field 20) — Report Compliance Condition Codes in conjunction with Account Status Codes and Payment Ratings when comments are required for legal compliance.

Refer to Exhibit 8 in the Metro 2® Format for descriptions of Compliance Condition Codes.

10. Current Balance (Base Segment, Field 21) — the total amount due from outstanding support payments. This amount must equal, at a minimum, one Scheduled Monthly Payment Amount.
11. Amount Past Due (Base Segment, Field 22) — the total amount in arrears
12. FCRA Compliance/Date of First Delinquency (Base Segment, Field 25) — the activity date

The FCRA Compliance/Date of First Delinquency must freeze when the child, or youngest child (in the case of multiple children), reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

13. ECOA Code (Base Segment, Field 37) — 1 (individual) on all records
14. Consumer Information Indicator (Base Segment, Field 38) — Report code T (Credit Grantor Cannot Locate Consumer) and code U (Consumer Now Located) when appropriate.

Note: Refer to FAQ 23 for guidelines on reporting an account when a consumer files bankruptcy, but the child support obligation is not included in the bankruptcy.

Child Support Reporting

GENERAL REPORTING GUIDELINES

The Child Support Enforcement Program was established in 1975 under Title IV-D of the Social Security Act, to help state and local agencies locate absent parents and to collect child support from parents legally obligated to pay.

Child support obligations are renewable from month to month. Although each monthly payment satisfies that month's obligation, the next month immediately begins a new obligation, to be satisfied by the next payment. The entire support obligation is not considered satisfied until the child reaches the age of majority or emancipation, or the statute of limitations for that state has been reached.

- Report data in the standard Metro 2® Format, including the Header Record.
- Report full file on a monthly basis.
- Report the complete name, social security number, date of birth, and address of the obligor.
- Report the telephone number, when available.
- An acceptable reason for deleting accounts is when Child Support cases are withdrawn by the courts.
- In the Identification Number field, report the internal code that identifies the child support agency where the information is verified.
- All parties reporting credit information must comply with the Fair Credit Reporting Act and any applicable state laws.
- All parties reporting credit information must respond to consumer inquiries.

Note: The guidelines contained in this document are specific to your industry and should be used in conjunction with the specifications in the Metro 2® Format. Refer to the Metro 2® Format for detailed information on segments and field information.

CHILD SUPPORT REPORTING GUIDELINES

1. State agencies **that are able to age the accounts** should report the following Account Status Codes (Base Segment, Field 17A):

Status 11

Reported for all open, current accounts, and for cases that have been brought current. Use this status when the child, or youngest child (in the case of multiple children), has **not** yet reached the age of majority or emancipation, or the statute of limitations for judgments in that state has not been reached.

Status 13¹

Reported when the Office of Child Support Enforcement rates this case "satisfied." Use this status when the child, or youngest child (in the case of multiple children), **has** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Status 62

Reported when the Office of Child Support Enforcement rates this case as "satisfied" and the account was previously a collection. Use this status when the child, or youngest child (in the case of multiple children), **has** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Statuses 71, 78, 80, 82-84²

Reported to reflect the appropriate stage of delinquency (30 days to 180 or more days past the due date).

Status 93²

Reported when the Office of Child Support Enforcement rates this case as in collections.

Status DA

Reported when a Child Support case is withdrawn by the courts. The action taken by the consumer reporting agencies is to delete the account from their files.

Note: When the child support case is transferred to another state because of the relocation of the obligor, follow the standard guidelines in Frequently Asked Question and Answer 46 (option 2 with Special Comment O – transferred to another company/servicer). This transfer usually occurs with a URESA (Uniform Reciprocal Enforcement Support Act) account. The state agency is responsible for notifying another agency when the account is being transferred to their jurisdiction.

Report the Payment History Profile, which provides up to 24 months of payment history, in order for the agency to control and maintain the payment history.

¹ When the Account Status is 13, the Payment Rating must also be reported.

² When Status 71, 78, 80, 82-84 or 93 is reported, the account should be reported with a Special Comment "CS" each month in order to overlay the date of first delinquency. Special Comment "CS" is reported only until the child or youngest child reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

CHILD SUPPORT REPORTING GUIDELINES

State agencies ***that are unable to age the accounts*** should report the following Account Status Codes (Base Segment, Field 17A):

Status 11

Reported for all open, current accounts, and for cases that have been brought current. Use this status when the child, or youngest child (in the case of multiple children), has ***not*** yet reached the age of majority or emancipation, or the statute of limitations for judgments in that state has not been reached.

Status 13¹

Reported when the Office of Child Support Enforcement rates this case "satisfied" and the account was previously reported as current. Use this status when the child, or youngest child (in the case of multiple children), ***has*** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Status 62

Reported when the Office of Child Support Enforcement rates this case "satisfied" and the account was previously a collection. Use this status when the child, or youngest child (in the case of multiple children), ***has*** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Status 93

Reported when the Office of Child Support Enforcement rates this case as in collections. If a Status 93 is reported, the account should be reported with a Special Comment "CS" each month in order to overlay the date of first delinquency. Special Comment "CS" is reported only until the child or youngest child reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

Status DA

Reported when a Child Support case is withdrawn by the courts. The action taken by the consumer reporting agencies is to delete the account from their files.

Note: When the child support case is transferred to another state because of the relocation of the obligor, follow Frequently Asked Question and Answer 46 (option 2 with Special Comment O – transferred to another company/servicer). This transfer usually occurs with a URESA (Uniform Reciprocal Enforcement Support Act) account. The state agency is responsible for notifying another agency when the account is being transferred to their jurisdiction.

¹ When the Account Status is 13, the Payment Rating must also be reported.

CHILD SUPPORT REPORTING GUIDELINES

2. Portfolio Type (Base Segment, Field 8) — O (Open)
3. Account Type Codes (Base Segment, Field 9)
 - 50 – Family Support
 - 93 – Child Support
4. Date Opened (Base Segment, Field 10) — the date the case was initiated with the state agency
5. Highest Credit or Original Loan Amount (Base Segment, Field 12) — zero
6. Terms Duration (Base Segment, Field 13) — 001
7. Scheduled Monthly Payment Amount (Base Segment, Field 15) — the monthly debt obligation of the obligor
8. Special Comment Codes (Base Segment, Field 19) — Any Special Comment Code can be reported on accounts that do not require Special Comment Code CS or O.

Refer to Exhibits 6 and 7 in the Metro 2® Format for descriptions of Special Comment Codes.

9. Compliance Condition Codes (Base Segment, Field 20) — Report Compliance Condition Codes in conjunction with Account Status Codes and Payment Ratings when comments are required for legal compliance.

Refer to Exhibit 8 in the Metro 2® Format for descriptions of Compliance Condition Codes.

10. Current Balance (Base Segment, Field 21) — the total amount due from outstanding support payments. This amount must equal, at a minimum, one Scheduled Monthly Payment Amount.
11. Amount Past Due (Base Segment, Field 22) — the total amount in arrears
12. FCRA Compliance/Date of First Delinquency (Base Segment, Field 25) — the activity date

The FCRA Compliance/Date of First Delinquency must freeze when the child, or youngest child (in the case of multiple children), reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

13. ECOA Code (Base Segment, Field 37) — 1 (individual) on all records
14. Consumer Information Indicator (Base Segment, Field 38) — Report code T (Credit Grantor Cannot Locate Consumer) and code U (Consumer Now Located) when appropriate.

Note: Refer to FAQ 23 for guidelines on reporting an account when a consumer files bankruptcy, but the child support obligation is not included in the bankruptcy.

Debt Buyer/Third Party Collection Agency Reporting

GENERAL REPORTING GUIDELINES

A Debt Buyer is a company or individual who purchases accounts (generally non-performing debts) with the intent of collecting debts owed. A Third Party Collection Agency is a company or individual who specializes in collecting outstanding debts for other businesses or individuals.

- Report data in the standard Metro 2® Format, including the Header Record.
- Report the complete name, address, social security number and date of birth for the legally liable consumer(s).
- Report all accounts on a monthly basis, including open collection accounts, collection accounts paid in full, and accounts requiring deletion or correction.
- Report paid in full collection accounts before purging the accounts from your internal collection system. Do not re-report paid accounts for more than 3 months.
- Do not report Medical Debt collection accounts (as defined by Creditor Classification Code 02) until they are at least 180 days past the Date of First Delinquency that led to the account being sold or placed for collection.
- **Do not delete paid in full collection accounts.**
- Accounts must be deleted for the following reasons:
 - Accounts which have been forwarded or sold to another entity (Debt Buyers)
 - Accounts which have been canceled and returned to creditor (Third Party Collection Agencies)
 - Accounts reported in error
 - Accounts which have been confirmed as fraudulent
 - Accounts for consumers who are deceased
 - Accounts that are being paid by insurance or were paid in full through insurance (not by the consumer)
 - Accounts of consumers who have filed petitions for Bankruptcy (Third Party Collection Agencies)

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

- All parties reporting credit information must comply with the Fair Credit Reporting Act (FCRA), Fair Debt Collection Practices Act (FDCPA), any applicable state laws and regulatory authorities.
- The Date of First Delinquency is used to comply with FCRA sections 605 and 623 (obsolescence period). See page 10-4 of this document for detailed reporting requirements.
- The Creditor Classification must be reported in the K1 Segment to identify the original creditor's type of business. Note that code 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.
- In the Identification Number field, report the internal code that identifies the debt buyer or third party collection agency where information is verified.
- All parties reporting credit information must respond to consumer inquiries.

Note: The guidelines in this document are specific to your industry and should be used in conjunction with the specifications in the Metro 2® Format. Refer to the Metro 2® Format for detailed information on segments and field information.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

1. Consumer Account Number (Base Segment, Field 7)
 - Report the individual's complete and unique account number as extracted from your file.
 - If the account number changes, report the L1 Segment. See field definitions in the Metro 2® Format.

Note: Notify your consumer reporting agencies the first time L1 Segments are reported.
2. Portfolio Type (Base Segment, Field 8) — O (Open)
3. Account Type Codes (Base Segment, Field 9)
 - 0C — Debt Buyer
 - 48 — Collection Agency/Attorney
 - 77 — Returned Check
4. Date Opened (Base Segment, Field 10) — the date the account was purchased by the debt buyer or placed/assigned to the third party collection agency. When reporting returned checks, provide the date the check was written.
5. Highest Credit or Original Loan Amount (Base Segment, Field 12) — original assigned amount as of the date purchased, placed or assigned. When reporting returned checks, report the original amount of the check, excluding fees and interest.
6. Terms Duration (Base Segment, Field 13) — 001
7. Account Status Codes (Base Segment, Field 17A) — report **only** the following:
 - 93 — Account assigned to internal or external collections
 - 62 — Paid in full, was a collection account
 - DF — Delete entire account due to confirmed fraud
 - DA — Delete entire account (for reasons other than fraud – see below)
 - Accounts reported in error
 - Consumer is deceased. (if no other associated consumer remains responsible for the account)
 - Accounts that are being paid by insurance or were paid in full through insurance (not by the consumer)
 - Debt Buyers must also delete accounts that have been forwarded or sold to another entity.
 - Third Party Collection Agencies must also delete accounts for the following reasons:
 - Accounts that have been canceled and returned to the creditor
 - Accounts of consumers who have filed petitions for Bankruptcy

Do not delete paid in full collection accounts.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

8. FCRA Compliance/Date of First Delinquency (Base Segment, Field 25) — the date of the first delinquency ***with the original creditor*** that led to the account being sold or placed for collection.

Example:

Original Credit Grantor Reports:

Date of Account Information	Account Status Code	Definition	Date of First Delinquency
05/31/2019	11	Current (0-29 days past the due date)	Zero fill
06/30/2019	71	30-59 days past the due date	06/20/2019
07/31/2019	78	60-89 days past the due date	06/20/2019
08/31/2019	80	90-119 days past the due date	06/20/2019
09/30/2019	82	120-149 days past the due date	06/20/2019
10/31/2019	83	150-189 days past the due date	06/20/2019

Account is sold to debt buyer or assigned to collection agency.

Debt Buyer/Collection Agency Reports:

Date of Account Information	Account Status Code	Definition	Date of First Delinquency
12/31/2019	93	Collection	06/20/2019
01/31/2020	93	Collection <i>Consumer agrees to a repayment plan. First payment is received by debt buyer, collection agency or credit grantor's internal collection department.</i>	06/20/2019
02/28/2020	93	Collection <i>Consumer continues to make payments. Current Balance is reported as decreasing.</i>	06/20/2019
03/31/2020	62	Paid collection account <i>Current Balance is reported as zero.</i>	06/20/2019

Notes: The FCRA Compliance/Date of First Delinquency does not change due to subsequent repayment agreements.

When reporting returned checks, report the date the check was returned for insufficient funds. If not available, report the date of the check.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

FCRA Compliance/Date of First Delinquency (continued)

Effective March 31, 2004, the FCRA¹ states that “provided that the consumer does not dispute the information, a person that furnishes information on a delinquent account that is placed for collection, charged for profit and loss, or subjected to any similar action, complies with this paragraph, if –

(i) the person reports the same date of delinquency as that provided by the creditor to which the account was owed at the time at which the commencement of the delinquency occurred, if the creditor previously reported that date of delinquency to a consumer reporting agency;

(ii) the creditor did not previously report the date of delinquency to a consumer reporting agency, and the person establishes and follows reasonable procedures to obtain the date of delinquency from the creditor or another reliable source and reports that date to a consumer reporting agency as the date of delinquency; or

(iii) the creditor did not previously report the date of delinquency to a consumer reporting agency and the date of delinquency cannot be reasonably obtained as provided in clause (ii), the person establishes and follows reasonable procedures to ensure the date reported as the date of delinquency precedes the date on which the account is placed for collection, charged to profit or loss, or subjected to any similar action, and reports such date to the credit reporting agency.”

9. Report Special Comments (Base Segment, Field 19) in conjunction with Account Status Codes to further define the accounts. As an example, Special Comment AU (Account paid in full for less than the full balance) could be reported with Account Status Code 62.

¹ Fair Credit Reporting Act Section 623(a)(5) [15 U.S.C. § 1681s-2]

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

10. Compliance Condition Codes (Base Segment, Field 20) – report the following codes, which are applicable to disputes under the Fair Debt Collection Practices Act (FDCPA) and to direct disputes under the Fair Credit Reporting Act (FCRA).

XB – Account information has been disputed by the consumer directly to the data furnisher under the FCRA; the data furnisher is conducting its investigation. *Code XB should be reported for FDCPA disputes.*

Important Note: Code XB should no longer be reported after the investigation is completed; the XB should be removed by reporting the removal code or changed to another code.

XC – FCRA direct dispute investigation completed – consumer disagrees with the results of the data furnisher’s investigation.

XH – Account previously in dispute; the data furnisher has completed its investigation. (To be used for disputes under the FDCPA and for direct disputes under the FCRA)

XR – Removes the most recently reported Compliance Condition Code

11. Current Balance (Base Segment, Field 21) and Amount Past Due (Base Segment, Field 22) — may include fees and interest, depending on state and federal laws. If payments are made, the Current Balance and Amount Past Due should decrease accordingly.
12. Date of Last Payment (Base Segment, Field 27) – the date of the most recent payment made to the debt buyer or third party collection agency.
13. Address (Base Segment, Fields 39 – 45; J2 Segment, Fields 12 – 18) – report the consumer’s full address as provided by the original creditor or a newer known address. If the consumer’s current address is unknown, report the consumer’s last known address and Address Indicator ‘N’ (not confirmed address).

Note: An address found through skip tracing processes should be reported only when confirmed to be the address of the consumer you are reporting.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

14. ECOA Code (Base Segment, Field 37; J1 and J2 Segment, Field 10) — used to designate an account as joint, individual, etc. in compliance with the Equal Credit Opportunity Act (ECOA). Refer to Exhibit 10 in the Metro 2® Format for a list of available codes.

Notes: Authorized users (ECOA Code 3) should not be reported because they are not contractually liable.

For accounts with more than one associated borrower, if one borrower becomes deceased, report ECOA Code Z (Delete Consumer) for that borrower. In subsequent reporting periods, only the remaining consumer should be reported.

15. Consumer Information Indicator (Base Segment, Field 38; J1 and J2 Segment, Field 11) — used to specify that a consumer has filed bankruptcy or a consumer cannot be located. Refer to Exhibit 11 in the Metro 2® Format for a list of available indicators.

Note: Debt Buyers should not report purchased accounts that were included in discharged/completed Bankruptcies.

16. Report the K1 Segment, which contains the name of the original creditor, including any partnering affinity name, and the creditor's classification. The Affinity Name further identifies or provides linkage detail for the relationship of the original creditor to any connecting or supporting entities (e.g., ABC BANK THE HOME STORE).

When reporting returned checks, report the name of the payee in the Original Creditor Name field. Note that code 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.

Notes: Refer to the guidelines for the K1 Segment in the Metro 2® Format.

Both the Original Creditor Name and Creditor Classification are required and must be reported. The purpose of reporting the original creditor name is to help consumers identify the source of accounts that appear on their credit reports. Without the original creditor names, consumers may not know what the accounts represent.

Federal law stipulates that the name of the payee must be identified when reporting returned checks. It also stipulates that medical debts must be identified.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

17. The following Base Segment fields are not applicable:

- Cycle Identifier (Field 6) – blank fill
- Credit Limit (Field 11) – zero fill
- Terms Frequency (Field 14) – blank fill
- Scheduled Monthly Payment Amount (Field 15) – zero fill
- Payment Rating (Field 17B) – blank fill
- Payment History Profile (Field 18) – blank fill
- Original Charge-off Amount (Field 23) – zero fill

18. **Debt Buyers only** – An optional segment that may be reported is the K2 Segment, which contains the name of the company from which the account was purchased. If the original creditor name, which is reported in the K1 Segment, and the name of the company from which the account was purchased, are the same, the K2 Segment should not be reported.

Mortgage Loan Modifications

GENERAL REPORTING GUIDELINES

Report accounts in the standard Metro 2[®] Format. Refer to the Field Definitions module for detailed reporting guidelines.

Making Home Affordable Program (HAMP)	
• First Liens	Page 11-2
• Second Liens	Page 11-5
Home Affordable Foreclosure Alternatives SM (HAFA)	Page 11-6
Hardest Hit Fund (Unemployment Assistance)	Page 11-7
Other Unemployment Programs	Page 11-8
Hope for Homeowners Program	Page 11-9
Mortgage Loan Modification Program – Freddie Mac and Fannie Mae	Page 11-10
Home Affordable Refinance Program (HARP)	Page 11-11
General Guidelines for Renegotiated/Refinanced Accounts	Page 11-11

MAKING HOME AFFORDABLE PROGRAM

First Liens

Program Description

The consumer must first make three reduced payments during the 3-month trial period before the loan modification becomes effective.

If the three payments are made, the loan will be modified for the purpose of creating an affordable payment plan for the consumer. Commonly, Terms Duration may be extended and Scheduled Monthly Payment Amounts may be changed. A portion of the principal loan amount may be set aside, but must be paid upon transfer, payoff, sale, or at maturity.

Reporting Guidelines for Trial Period:

The guidelines below should be followed when reporting payments during the trial period:

1. Current, but facing imminent default or Current, but eligible for loan modification

If the consumer was current on his/her payments prior to the trial period, and makes each month's trial period payment on time, report the consumer as current (Account Status 11) during the trial period. If the consumer is at least 30 days past due during the trial period, report the Account Status Code that reflects the appropriate level of delinquency.

Report the trial period payment in the Scheduled Monthly Payment Amount field. Special Comment Code 'AC' (Paying under a partial payment agreement) should also be reported.

2. Delinquent

If the consumer was delinquent (at least 30 days past the due date) prior to the trial period and the reduced payments do not bring the account current, report the Account Status Code that reflects the appropriate level of delinquency.

Report the trial period payment in the Scheduled Monthly Payment Amount field. Special Comment Code 'AC' (Paying under a partial payment agreement) should also be reported.

(continued)

MAKING HOME AFFORDABLE PROGRAM

First Liens (continued)

After the trial period:

If the loan is not modified, report the account as per the original contractual agreement.

If the loan is modified, the guidelines below for modified loans should be followed. Report the appropriate Account Status Code for each reporting period based on the new terms of the loan. Prior payment history reported on the account will be retained.

Reporting Guidelines for Modified Loans

Continue to report one tradeline under the original Account Number.

- Date Opened = the date the account was originally opened
- Original Loan Amount = the original amount of the loan, including the Balloon Payment Amount, if applicable
- Terms Duration = the modified terms

Note: Terms Duration should reflect the terms for the life of the account. For a loan modification, set the Terms Duration from the original Date Opened to the new maturity date.

- Scheduled Monthly Payment Amount = new scheduled monthly payment amount as per the modified agreement
- Current Balance = the principal balance (including the Balloon Payment Amount if applicable), plus late charges, fees, interest and escrow that are due during the current reporting period

Note: If a portion of the loan is forgiven, the forgiven amount should be deducted from the Current Balance owed.

- Account Status Code = the appropriate code based on the new terms of the loan
- Special Comment Code = CN (Loan modified under a federal government plan)

Note: Special Comment Code CN should be reported as long as deemed appropriate by the data furnisher (such as, for 5 years until the interest rate is lowered), or until another special comment becomes more critical. For the length of time the special comment should be reported, consult with your internal Legal or Compliance department.

(continued)

MAKING HOME AFFORDABLE PROGRAM

First Liens (continued)

- K4 Segment = used to report the Balloon Payment or principal forbearance information, if applicable:
 - Specialized Payment Indicator = 01 (Balloon Payment)
 - Balloon Payment Due Date = the date the balloon payment is due which is equal to maturity of the amortizing portion of the loan.

Note: The payoff date can be used in this field.

- Balloon Payment Amount = the amount of the balloon payment in whole dollars only

Note: If your system requires you to change the Account Number, report the L1 Segment with the new Account Number, following reporting guidelines for the L1 Segment.

MAKING HOME AFFORDABLE PROGRAM

Second Lien Modification Program (2MP)

Under 2MP, when a borrower's first lien is modified under HAMP (Home Affordable Modification Program) and the servicer of the second lien is a 2MP participant, that servicer must offer either to modify the borrower's second lien according to a defined protocol or to accept a lump sum payment from Treasury in exchange for full extinguishment of the second lien.

Reporting Guidelines for Modified Second Liens and Partially Extinguished Second Liens

Follow the reporting guidelines for modified first liens (including the trial period and the modified loan) as described on pages 11-2 through 11-4.

For partially extinguished second liens, the forgiven portion of the loan should be deducted from the Current Balance owed.

IMPORTANT NOTE: When a borrower is current on the existing second lien and the current contractual payment amount is equal to or greater than the monthly payment that will be due following the 2MP modification, a trial period may not be required. The servicer and borrower may execute a modification of the second lien immediately following modification of the HAMP-modified first lien.

Reporting Guidelines for Extinguished Second Liens

Second liens that are fully extinguished under 2MP are forgiven and as such, are considered to be paid. Report all forgiven accounts as specified below:

- Account Status Code = 13 (Paid)
- Payment Rating = the appropriate code that identifies the status of the account within the current month's reporting period
- Special Comment Code = AU (Account paid in full for less than the full balance)
- Current Balance and Amount Past Due = zero
- Date Closed = date the account was forgiven and considered to be paid

Note that payment history for the forgiven accounts will be retained.

HOME AFFORDABLE FORECLOSURE ALTERNATIVESSM (HAFA)

HAFA provides two options for consumers: a Short Sale or a Deed-in-Lieu (DIL) of foreclosure.

In a short sale, the mortgage company allows the sale of the consumer's house for an amount that falls short of the amount still owed. Unlike conventional short sales, a HAFA short sale completely releases the consumer from the mortgage debt after selling the property. The consumer will no longer be responsible for the amount that falls short of the amount owed. The deficiency is guaranteed to be waived by the servicer.

In a Deed in Lieu, the mortgage company allows the consumer to give the title back, transferring ownership back to the mortgage company.

Reporting Guidelines

Follow the reporting guidelines in Frequently Asked Question & Answer 53 for Alternatives to Foreclosure: Deed in Lieu and Short Sale.

HARDEST HIT FUND (UNEMPLOYMENT ASSISTANCE)

Program Description

Treasury announced the Hardest Hit Fund program early in 2010 providing targeted aid to 18 states and the District of Columbia. The objective of the Housing Finance Agency's (HFAs) Hardest-Hit Fund is to allow HFAs to develop creative, effective approaches that consider local conditions. Treasury has outlined below many of the possible types of transactions that would meet the requirements of the Emergency Economic Stabilization Act of 2008.

- a. **Mortgage Modifications** – Programs may provide for mortgage modification of loans held by HFAs or other financial institutions or provide incentives for servicers / investors to modify loans.
- b. **Mortgage Modifications with Principal Forbearance** – Programs may provide for paying down all or a portion of an overleveraged loan and taking back a note from the borrower for that amount in order to facilitate additional modifications.
- c. **Short Sales / Deeds-In-Lieu of Foreclosure** – Programs may provide for assistance with short sales and deeds in lieu of foreclosure in order to prevent avoidable foreclosures.
- d. **Principal Reduction Programs for Borrowers with Severe Negative Equity** – Programs may provide incentives for financial institutions to write-down a portion of unpaid principal balance for homeowners with severe negative equity.
- e. **Unemployment Programs** – Programs may provide assistance to unemployed borrowers to help them avoid preventable foreclosures.
- f. **Second Lien Reductions** – Programs may provide incentives to reduce or modify second liens.

Reporting Guidelines

For reporting guidelines on the various types of transactions described above, refer to other sections within this module and to various Frequently Asked Questions & Answers.

OTHER UNEMPLOYMENT PROGRAMS

Home Affordable Unemployment Program

For consumers who are unemployed, depending on their situation, MHA's **Home Affordable Unemployment Program (UP)** may reduce the consumer's mortgage payments to 31 percent of their income or suspend payments altogether for 12 months or more. UP is not currently available for homeowners with mortgages held by Fannie Mae and Freddie Mac.

Fannie Mae's Unemployment Forbearance Program

Servicers have the flexibility to assist consumers who have a financial hardship due to unemployment. This program allows the consumer to receive a reduction or suspension of the monthly mortgage payment for a specific period of time. If during the final month of the initial Unemployment Forbearance period, the consumer remains unemployed, the servicer must determine if the consumer is eligible for an extension of Unemployment Forbearance of no more than six additional months.

Freddie Mac's Unemployment Forbearance Program

Freddie Mac's forbearance requirements provide a "short-term unemployment forbearance" relief option to assist consumers who are unable to make their mortgage payments due to unemployment. In addition, Freddie Mac offers an "extended unemployment forbearance" relief option to provide an extension of the forbearance period if the consumers have not regained employment after the short-term forbearance period has ended. These additional relief options give unemployed borrowers an opportunity to retain homeownership by providing mortgage payment relief while they seek re-employment.

Servicers have delegated authority to approve an eligible consumer for a short-term unemployment forbearance period of six months during which time the monthly mortgage payment is either suspended or reduced. If the consumer remains unemployed at the end of the short-term unemployment forbearance period, the Servicer must consider the consumer for extended unemployment forbearance. If the consumer meets the eligibility criteria for extended unemployment forbearance, the Servicer must obtain Freddie Mac's written approval before entering into an extended unemployment forbearance plan with the consumer.

Reporting Guidelines

Follow the reporting guidelines documented in Frequently Asked Question & Answer 45 for Accounts in Forbearance for the programs described above.

HOPE FOR HOMEOWNERS PROGRAM

The HOPE for Homeowners Act of 2008 created a new program within FHA to back FHA-insured mortgages to distressed borrowers. The new mortgages offered by FHA-approved lenders will refinance loans at a significant discount for homeowners facing difficulty meeting their mortgage payments.

Reporting Guidelines:

1. The original mortgage loan is considered to be closed due to refinance and a new loan is opened.

Report the original mortgage loan as specified below:

- Account Status Code = 13 (Paid)
- Payment Rating = the appropriate code that identifies the status of the account within the current month's reporting period
- Special Comment Code = AS (Account closed due to refinance)
- Current Balance and Amount Past Due = zero
- Date Closed = date the account was closed due to refinance

Note that payment history for the original mortgage loan will be retained.

Report the newly refinanced loan with the new Account Number, new Date Opened, Special Comment Code CN (Loan modified under a federal government plan) and all other applicable fields.

Note that payment history that occurred prior to the new Date Opened should **not** be reported with this account.

2. All subordinate liens on the property must be extinguished. Any such liens (i.e., loans or lines of credit) are forgiven and are considered to be paid.

Report all forgiven accounts as specified below:

- Account Status Code = 13 (Paid)
- Payment Rating = the appropriate code that identifies the status of the account within the current month's reporting period
- Special Comment Code = AU (Account paid in full for less than the full balance)
- Current Balance and Amount Past Due = zero
- Date Closed = date the account was forgiven and considered to be paid

Note that payment history for the forgiven accounts will be retained.

MORTGAGE LOAN MODIFICATION PROGRAM – FREDDIE MAC AND FANNIE MAE

Freddie Mac & Fannie Mae began offering a streamlined modification program starting 12/15/2008 for a targeted group of borrowers with certain loan criteria. As it relates to credit reporting, all eligible loans under this program must be at least 3 payments delinquent.

The consumer must first make three reduced payments during the 3-month trial period before the loan modification becomes effective. During that time, the data furnisher should report the true Account Status Code, which is delinquent, and Special Comment Code AC (Paying under a partial payment agreement).

If the three payments are made, the loan will be modified for the purpose of creating an affordable payment plan for the consumer. Terms Duration may be extended and Scheduled Monthly Payment Amounts may be changed. A portion of the principal loan amount may be set aside, but must be paid upon transfer, payoff, sale, or at maturity. This set-aside amount would be considered the balloon payment.

Reporting Guidelines:

Continue to report one tradeline under the original Account Number.

- Date Opened = the date the account was originally opened
- Original Loan Amount = the original amount of the loan, including the Balloon Payment Amount
- Terms Duration = the modified terms
Note: Terms Duration should reflect the terms for the life of the account. For a loan modification, set the Terms Duration from the original Date Opened to the new maturity date.
- Scheduled Monthly Payment Amount = the new scheduled monthly payment amount as per the modified agreement
- Current Balance = the principal balance (including the Balloon Payment Amount if applicable), plus late charges, fees, interest and escrow that are due during the current reporting period
- Account Status Code = the appropriate code based on the new terms of the loan
- Special Comment Code = CN (Loan modified under a federal government plan)

Note: Special Comment Code CN should be reported as long as deemed appropriate by the data furnisher, or until another special comment becomes more critical. For the length of time the special comment should be reported, consult with your internal Legal or Compliance department.

- K4 Segment = used to report Balloon Payment or principal forbearance information:
 - Specialized Payment Indicator = 01 (Balloon Payment)
 - Balloon Payment Due Date = the date the balloon payment is due which is equal to maturity of the amortizing portion of the loan
Note: The payoff date may be used in this field.
 - Balloon Payment Amount = amount of the balloon payment in whole dollars only

HOME AFFORDABLE REFINANCE PROGRAM (HARP)

The guidelines documented in Frequently Asked Question & Answer 42 (General Guidelines for Renegotiated or Refinanced Loans) may be used when reporting loans refinanced under HARP.

GENERAL GUIDELINES FOR RENEGOTIATED/REFINANCED MORTGAGE ACCOUNTS

Refer to Frequently Asked Question and Answer 42 for general guidelines on reporting renegotiated or refinanced mortgage accounts (i.e., mortgage loans that are not modified through one of the federal government programs).

Student Loan Reporting

This module contains the reporting guidelines for both Federal and Private Student Loans. The contents of the two separate sections are detailed below.

Student Loan Reporting – Federal Loans

General Reporting Guidelines	Page 12-2
Federal Loans – Lender/Servicer/Secondary Market	Page 12-3
Single, Multiple and Consolidated Loans, Deferment or Forbearance, Loan Defaults and Transfers	Page 12-9
Loan Forgiveness and Discharge	Page 12-12
Total and Permanent Disability (TPD) Discharge Procedures for Non-defaulted Loans (Standard and VA)	Page 12-14
Total and Permanent Disability (TPD) Discharge Procedures (Federal Perkins Loan Program)	Page 12-15
Rehabilitated Student Loans and Recalled and Repurchased Student Loans	Page 12-16
Federal Loans – Reporting Guidelines for Post-Default Loans	Page 12-17
Special Situations	Page 12-20
Total and Permanent Disability (TPD) Discharge Procedures for Non-defaulted FFELP Loans (Standard and VA)	Page 12-21
Total and Permanent Disability (TPD) Discharge Procedures for Defaulted Loans (Standard and VA)	Page 12-21
Federal Student Loan Glossary of Terms	Page 12-22

Student Loan Reporting – Private Loans

General Reporting Guidelines	Page 12-25
Private Loans – Lender/Servicer/Secondary Market	Page 12-26
Single, Multiple and Refinanced Loans, Deferment or Forbearance, Loan Sales and Transfers, Co-Signer Release, Loan Defaults	Page 12-33
Write-off of Private Student Loan Balances due to Death or Disability: For private student loans, write-off reporting requirements apply following approval by the loan holder.	Page 12-36
Rehabilitated Private Student Loans	Page 12-38
Private Student Loan Glossary of Terms	Page 12-42

Student Loan Reporting – Federal Loans

GENERAL REPORTING GUIDELINES

Reporters of federal student loan information include lenders, servicers, secondary markets, collection agencies and the U.S. Department of Education (“ED”).

The following reporting guidelines refer to all reporters of federal student loan information:

- Report data in the standard Metro 2[®] Format, including the Header Record.
- Report all open accounts on a monthly basis.
- Report transferred, paid, and government claim accounts in the reporting period in which they are finalized.
- Do not report accounts prior to the first disbursement.
- Report the complete name, address, social security number and date of birth of the consumer.
- In the Identification Number field, report the internal code that identifies the lender, secondary market, or guarantor where information is verified. For servicers, the Identification Number should refer to the current loan owner/holder; e.g., Servicer Name/Dept. of Ed.
- All parties reporting credit information must respond to consumer inquiries.

Note: The guidelines in this document are specific to your industry and should be used in conjunction with specifications in the Metro 2[®] Format. Refer to the Metro 2[®] Format for detailed information on segments and field information.

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

All fields within the Metro 2® Format are required to be reported for each account. The information below describes fields that require specific values.

Do not report a loan until a disbursement has been made.

Identification Number Base Segment, Field 5	<p>For loans reported by a servicer, the Identification Number should refer to the current loan owner/holder or servicer and loan owner/holder; e.g., Servicer Name/Dept. of Ed.</p> <p>Note: Verification of accounts will be done with the servicer.</p>
Account Type Code Base Segment, Field 9	12 (Education) for installment accounts
Highest Credit or Original Loan Amount Base Segment, Field 12	<p>The Original Loan Amount should be increased for subsequent disbursements of a loan, and reduced for disbursements that are canceled or returned.</p> <p>Do not increase the Original Loan Amount as a result of interest capitalization or fees incurred post-disbursement.</p>
Terms Duration Base Segment, Field 13	<p>Report the maximum number of months allowed for repayment of the loan.</p> <p>For loans in an Income Driven Repayment (IDR) plan, the Terms Duration should reflect the maximum number of months allowed for repayment of the loan, which is the number of months between the start of repayment and when the loan could be forgiven if not repaid by the borrower, or the fixed number of months for the IDR plan. For example, a loan being repaid under the Pay as You Earn Repayment Plan should always have Terms Duration = 240 months.</p> <p>While payments are being made toward the Public Service Loan Forgiveness Program, report Terms Duration based on the actual repayment plan (i.e., standard, extended or IDR).</p> <p>When the loan is in a period during which payments are not required (i.e., initial in-school, grace, deferment, and forbearance periods), report Terms Duration as blank.</p> <p>For loans that are no longer guaranteed and are reported as in collections (Account Status 93 or 62), report a constant of 001.</p>
Scheduled Monthly Payment Amount, Base Segment, Field 15	<p>Report the monthly payment amount for the repayment plan in which the borrower is enrolled during the current reporting period.</p> <p>For loans in an Income Driven Repayment (IDR) plan, report the amount the consumer is required to pay for each month in the IDR plan, which can be as low as \$0.</p>

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Account Status Code Base Segment, Field 17A</p>	<ul style="list-style-type: none"> • 11 = Open account in good standing <p>For ED-owned loans, Account Status 11 should be reported until the loan is 90 days or more past the due date as of the Date of Account Information.</p> <p>For all other federal student loans, Account Status 11 should be reported until the loan is at least 60 or 90 days past the due date as of the Date of Account Information, based on loan holder requirements.</p> <ul style="list-style-type: none"> • 11 for Income Driven Repayment (IDR) plans when the Scheduled Monthly Payment Amount = \$0 • 11 with Terms Frequency D and Payment History Profile Character B — Open account/payments deferred/account was never in repayment • 11 with Terms Frequency D and Payment History Profile Character D — Open account/payments deferred/account was previously in repayment <p>Note: Terms Frequency Code D should be used with Account Status Code 11 and Amount Past Due = 0 when payments are not currently required (e.g., deferment, grace period, forbearance), but there is a future payment obligation, even if the loan has an unresolved delinquency prior to or during the deferred period.</p> <ul style="list-style-type: none"> • 78, 80, 82–84 = the appropriate stage of delinquency (60 days to 180 or more days past the due date). Refer to Account Status 11 above for exceptions due to delayed delinquency reporting. • 13 = Paid/zero balance account (requires Payment Rating) <p>Note: For paid in full accounts, report the Date Closed. Also, report both the Current Balance and the Amount Past Due as zero. Refer to Frequently Asked Question and Answer 39 for additional guidance on reporting accounts that are paid in full.</p> <ul style="list-style-type: none"> • DA = Delete entire account • DF = Delete entire account due to confirmed fraud <p>Note: Refer to guidance throughout this module for specific situations on deleting accounts.</p> <p>(continued)</p>
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FEDERAL LOANS – LENDER SERVICER/SECONDARY MARKET

<p>Account Status Code Base Segment, Field 17A (continued)</p>	<p>For federally-guaranteed student loans that are <u>no longer guaranteed</u>, the following additional Account Status Codes may be reported for loans that are defaulted, in collections, or charged off:</p> <ul style="list-style-type: none"> • 93 = Account assigned to internal or external collections • 97 = Unpaid balance reported as a loss (charge-off) • 62 = Account paid in full, was a collection account • 64 = Account paid in full, was a charge-off
<p>Payment History Profile Base Segment, Field 18</p>	<p>Refer to Metro 2® Format module for standard guidelines on reporting up to 24 months of payment history.</p> <p>The Payment History Profile will reflect accounts going from current to 60 or 90 days delinquent due to delayed delinquency reporting (refer to Account Status 11 above).</p> <p>Examples:</p> <ul style="list-style-type: none"> • 332000000000220000000000 (first reported delinquent at 60 days) • 004333000000300030000000 (first reported delinquent at 90 days) <p>For months during which payments were not required (i.e., initial in-school, grace, deferment and forbearance periods):</p> <ul style="list-style-type: none"> • Report value D for loans that were previously in repayment. • Report value B for loans that have never been in repayment. <p>Note: If payment history was reported in error (i.e., account mistakenly reported as in repayment), report value D.</p> <p>When adjusting the initial in-school or grace period status of a loan that covers one or more months previously reported in the Payment History Profile, the applicable months should be updated to reflect character D (no payment history available this month).</p>

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Special Comment Base Segment, Field 19</p>	<p>The Special Comments that apply to Federal Student Loans are listed below. No other codes may be reported.</p> <ul style="list-style-type: none"> • O – when reporting a transfer to another servicer or guaranty agency that is not due to a loan sale, with the exception of internal transfers; i.e., ED-owned loans or defaults reported by a FFELP servicer • AH – when a loan is purchased by another company • AT – when reporting an internal transfer of an ED-owned loan or a default by a FFELP servicer • AU – when a loan is paid in full for less than the full balance • AW – when the borrower is affected by a natural or declared disaster. Follow guidance in FAQ 58. <p>Notes:</p> <p>Special Comment Code AL (Student Loan assigned to government) became obsolete for reporting as of April 2020.</p> <p>Special Comment Code CP (Forbearance) should not be used for federal student loans. Forbearance should be reported similarly to deferment, as per FAQ 44.</p>
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FEDERAL LOANS – LENDER /SERVICER/SECONDARY MARKET

FCRA Compliance/Date of First Delinquency (DOFD) Base Segment, Field 25	<p>Refer to Metro 2® Format module and Exhibit 9 (Explanation and Examples of FCRA Compliance/Date of First Delinquency) for standard guidelines on reporting DOFD according to hierarchy rules.</p> <p>Regarding hierarchy rules 1 and 2: Report the date of the first 30-day delinquency that led to the Account Status or Payment Rating being reported even though reporting of delinquency is delayed until the loan is 60 or 90 days past the due date. When the Account Status is 11 (Current), report Date of First Delinquency = 0. However, when reporting delinquent statuses, do not change/update the Date of First Delinquency unless the borrower has brought the account back to less than 30 days past the due date. A borrower may be less than 60 or 90 days past the due date (i.e., Account Status 11) without triggering a change to the Date of First Delinquency.</p> <p>Example:</p> <p>Refer to table below for example of DOFD reporting for loans that may not be reported as delinquent until 90 days past the due date.</p>
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Date of Account Information (Field 24)	Next Payment Due Date (not reported)	# of Days Past Due Date (not rptd.)	Account Status and Definition (Field 17A)	Date of First Delinquency (Field 25)
03/31/2019	04/15/2019	0	11 (Current)	Zero fill
04/30/2019	04/15/2019	15	11	Zero fill
05/31/2019	04/15/2019	46	11	Zero fill
06/30/2019	04/15/2019	76	11	Zero fill
07/31/2019	04/15/2019	107	80 (90-119 days past due)	05/15/2019 (30 days after 04/15/2019 due date)
08/31/2019	06/15/2019	77	11	Zero fill
09/30/2019	06/15/2019	107	80	05/15/2019 (DOFD does not reset; borrower never less than 30 days delinquent)
10/31/2019	08/15/2019	77	11	Zero fill
11/30/2019	10/15/2019	46	11	Zero fill
12/31/2019	12/15/2019	16	11	Zero fill (Borrower less than 30 days delinquent; DOFD will reset if future delinquency)
01/31/2020	12/15/2019	47	11	Zero fill
02/28/2020	12/15/2019	75	11	Zero fill
03/31/2020	12/15/2019	106	80	01/14/2020 (30 days after 12/15/2019 due date)

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Date of Last Payment Base Segment, Field 27</p>	<p>Report the date the most recent payment was received whether a partial or full payment was made.</p> <p>For loans in an Income Driven Repayment (IDR) plan, when the Scheduled Monthly Payment Amount = 0 and the Actual Payment Amount = 0, report the payment due date within the current reporting period as the Date of Last Payment.</p>
<p>Consumer Information Indicator Base Segment Field 38 J1 and J2 Segments – Field 11</p>	<p>Used to specify that a consumer's student loan has been included in bankruptcy or a consumer cannot be located. Refer to Exhibit 11 for a list of available indicators.</p> <p>Note: Refer to FAQ 23 for guidelines on reporting an account when a consumer files bankruptcy, but the student loan is not included in the bankruptcy discharge.</p>
<p>K4 Segment Deferred Payment information</p>	<p>Report for deferred loans:</p> <ul style="list-style-type: none"> • Specialized Payment Indicator = 02 (Deferred payment) • Deferred Payment Start Date = date the first payment is due. If not available, report the date on which the deferred period will end. <p>Note: If neither date is available, do not report the K4 Segment.</p>
<p>L1 Segment Consumer Account Number Change</p>	<p>When account history can be verified, report one time when account numbers change due to an account acquisition or internal account number change.</p> <p>Refer to FAQ 46 for guidelines on reporting when account history cannot be verified by the new servicer.</p>

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

Single, Multiple and Consolidated Loans, Deferment or Forbearance, Loan Defaults and Transfers	
Multiple disbursements of a single loan	<p>When a loan has multiple disbursements, report the loan as one account.</p> <ul style="list-style-type: none"> • Retain and do not change the original Consumer Account Number when additional disbursements are reported. • Retain and do not change the original Date Opened after the loan is reported. • Update the Original Loan Amount, Current Balance, and Scheduled Monthly Payment Amount (when in repayment) as applicable, to include totals for all disbursements. Reduce these amount fields as applicable, due to the amount of any canceled or returned disbursements. <p>Example: If the loan is for \$10,000 and the first disbursement is for \$2,000, report the Original Loan Amount field as \$2,000. If an additional disbursement is made for \$8,000, increase the Original Loan Amount to \$10,000. If the \$2,000 disbursement is subsequently canceled, reduce the Original Loan Amount to \$8,000.</p> <ul style="list-style-type: none"> • If all disbursements are canceled or returned, report Account Status DA to delete the account.
Multiple loans	Multiple loans must be reported as separate accounts.
Consolidated loans	<p>When a loan is paid in full through consolidation, report the loan with Account Status Code 13 and the appropriate Payment Rating.</p> <p>The new consolidation loan, which paid the underlying loans in full, must be reported as a new account.</p>

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FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

Loans in deferment or forbearance	Report federal student loans in deferment or forbearance as deferred. Refer to Frequently Asked Question and Answer 44 for specific reporting guidance.
Loans transferred <u>to</u> another servicer or lender	<p>Follow the standard guidelines in Frequently Asked Question and Answer 46 for servicing transfers.</p> <ul style="list-style-type: none"> • Report Special Comment Code AT for ED-owned loans. • Report Special Comment Code O or AT (as applicable) for guaranteed loans. <p>Follow the standard guidelines in Frequently Asked Question and Answer 47 for transfers as a result of a loan sale.</p>
Loans transferred in <u>from</u> another servicer or lender	Follow the standard guidelines in Frequently Asked Question and Answers 46 for servicing transfers and 48 for transfers in as a result of a loan purchase.
ED-owned loans transferred to ED due to default or ineligible borrower	Follow the standard guidelines in Frequently Asked Question and Answer 46 for servicing transfers. Report Special Comment Code AT to denote an internal transfer.
Guaranteed loans transferred to Guaranty Agency due to default/claim payment or bankruptcy	Follow the standard guidelines in Frequently Asked Question and Answer 46 for servicing transfers. Report Special Comment Code O or AT , as applicable.

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FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Federally guaranteed loans that are no longer guaranteed (i.e., unreinsured loans) that default/charge off and transfer from the servicer to another entity at the time of default/charge off</p>	<p>Follow the standard guidelines in Frequently Asked Question and Answer 46 for servicing transfers. Report Special Comment Code O or AT, as applicable.</p> <p>Report Account Status Code 97 with the applicable Special Comment Code if the loan was charged off at the time of transfer, or Account Status Code 93 if in collections at the time of transfer.</p>
<p>Defaulted federal loans that are no longer guaranteed (i.e., unreinsured loans) and are not transferred at the time of default/charge-off</p>	<p>If the loans have been charged off, follow the standard guidelines in Frequently Asked Questions and Answers 34 or 65, as applicable.</p> <p>Loans that have defaulted and are in collections should be reported with Account Status 93 and the Current Balance and Amount Past Due = outstanding balance amount. Account Status 62 must be reported when the loan is paid in full.</p> <p>As an option, loans that have defaulted and are in collections may be reported with the applicable level of delinquency rather than Account Status 93. When using this option, Account Status Code 13 should be reported when the account is paid in full.</p> <p>In all situations, if the account is settled for less than the outstanding balance, follow the guidance in Frequently Asked Question and Answer 38, which requires reporting Special Comment Code AU along with the applicable paid status.</p>

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

Loan Forgiveness and Discharge For guaranteed federal loans, the forgiveness or discharge reporting requirements apply following approval and payment of the claim by the guarantor.	
Loans forgiven due to Borrower Defense to Repayment	<p>If the account is partially forgiven, reduce the Current Balance to reflect the amount remaining after the partial forgiveness and update the Payment History Profile with character D for months prior to approval of the partial forgiveness. Continue reporting the account normally in subsequent reporting periods.</p> <p>If the loan is completely forgiven, report Account Status Code DA to delete the account.</p>
Loans forgiven due to Teacher Loan Forgiveness	<p>If the loan is partially forgiven, reduce the Current Balance to reflect the amount remaining after the partial forgiveness.</p> <p>If the loan is completely forgiven and had been in repayment prior to being forgiven, report Account Status Code 13, Payment Rating 0, Current Balance 0 and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed.</p> <p>If the loan is completely forgiven, but had never been in repayment, report Account Status Code DA to delete the account.</p>
Loans forgiven due to Public Service Loan Forgiveness	<p>Report Account Status Code 13, Payment Rating 0, Current Balance 0 and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed.</p>
Loans forgiven or paid in full upon completion of an income-driven repayment (IDR) plan	<p>Report Account Status Code 13, Payment Rating 0, Current Balance 0 and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed.</p>
Loans discharged due to school closure	<p>Report Account Status Code DA to delete the account.</p>
Loans discharged due to False Certification or, prior to discharge, when the loan is determined to be the result of identity theft	<p>Report Account Status Code DF to delete the account.</p>
Loans discharged due to Unpaid Refund	<p>Report Account Status Code DA to delete the account.</p>

(continued)

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Loans discharged due to the death of a student who is not a party to the loan (e.g., Parent PLUS Loan or Consolidated Loan that includes a Parent PLUS Loan)</p>	<p>If the loan had been in repayment prior to the student's death, report Account Status Code 13, Payment Rating 0, Current Balance 0, and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed. The Payment History Profile should be updated to reflect value D for months between the date of death and the reporting period in which the loan is reported with Account Status Code 13.</p> <p>If the loan had never been in repayment, report Account Status Code DA to delete the account.</p> <p>ECOA Code X should not be reported because the student that is deceased is not a party to the loan. ECOA Code X must be reported only when a party to the loan is deceased. Refer to Frequently Asked Question and Answer 19 for reporting when a party to the loan is deceased.</p>
<p>Loans discharged due to the death of a party to the loan</p>	<p>If the loan had been in repayment prior to the death of a party to the loan, report Account Status Code 13, Payment Rating 0, Current Balance 0, and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed. Report ECOA Code X in the applicable Base or J1/J2 Segment for the deceased party as described in Frequently Asked Question and Answer 19.</p> <p>If the loan had never been in repayment, report Account Status Code DA to delete the account.</p>

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

Total and Permanent Disability (TPD) Discharge Procedures for Non-defaulted Loans (Standard and VA)	
Initial indication of interest in TPD discharge by borrower	When notice is received from ED that the borrower has indicated interest in a TPD discharge and collection activities are suspended for 120 days, report the account as deferred. Refer to Frequently Asked Question and Answer 44 for specific reporting guidelines. Do not report Special Comment CP.
Initial TPD application filed by borrower	When notice is received from ED that the borrower has applied for a TPD discharge and collection activities are suspended, report the account as deferred. Refer to Frequently Asked Question and Answer 44 for specific reporting guidelines. Since the Deferred Payment Start Date will not be known, do not report the K4 Segment. Do not report Special Comment CP.
TPD discharge not approved	<p>If the discharge is not approved, stop reporting the account as deferred and resume reporting the account normally going forward.</p> <p>The "D's" reported in the Payment History Profile during the deferral time period should not be removed.</p>
TPD discharge approved	<p>Report the account with the following Base Segment fields:</p> <ul style="list-style-type: none"> Account Status Code = 13 (Paid) <p>Note: If the TPD effective date is prior to the date the loan entered repayment, or is prior to the date that the lender or servicer began reporting the loan, report Account Status DA to delete the account.</p> <ul style="list-style-type: none"> Payment Rating = 0 (Current; since no payments were due within this reporting period) Payment History Profile = Report value D (no payment history available this month) in the positions representing the months going back to the TPD effective date. Adjustments to months earlier than the previous 24 months prior to the Date of Account Information must be corrected by submitting an AUD through e-OSCAR®. <p>Note: Any delinquencies that occurred prior to the TPD effective date should remain on the file and should not be deleted.</p> <p>(continued)</p>

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

TPD discharge approved (continued)	<ul style="list-style-type: none"> • Current Balance and Amount Past Due = 0 • Date of Account Information = Report a date within the current month's reporting period even if the paid effective date was in a prior month. Refer to Frequently Asked Question and Answer 39. • Date Closed = Date the TPD discharge was approved by ED. <p>Notes: If notified by a subsequent servicer that the TPD effective date was during the period that a prior servicer was responsible for reporting the account, the prior servicer should also follow the reporting guidelines outlined above.</p> <p>If a loan discharged under Standard TPD is reinstated within 3 years, a new account will have to be reported by the current servicer because the discharged account was reported as paid. The new account should be reported with Account Status 11 (current).</p>
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Total and Permanent Disability (TPD) Discharge Procedures (Federal Perkins Loan Program)	
Non-defaulted loans	<ul style="list-style-type: none"> • Follow the standard guidelines in Frequently Asked Question and Answer 46; option 2 to report the account as transferred. • Any credit history already established by the borrower will be retained for historical credit reporting purposes. • No further reporting by the school is required. ED will be responsible for reporting the loan after assignment.
Defaulted loan (previously reported by the school as Account Status 93 (collection))	<ul style="list-style-type: none"> • Follow the standard guidelines in Frequently Asked Question and Answer 46; option 2 to report the account as transferred. • All collection history already reported will be retained for historical credit reporting purposes. • No further reporting by the school is required. ED will be responsible for reporting the loan after assignment.

FEDERAL LOANS – LENDER/SERVICER/SECONDARY MARKET

Rehabilitated Student Loans and Recalled and Repurchased Student Loans

Section 428F(a)(1)(A) of the Higher Education Act of 1965 was amended by the Higher Education Opportunity Act of 2008 to require that, upon the rehabilitation of a defaulted loan, the holder of the loan must request any consumer reporting agency to which the guaranty agency or holder had reported the default of the loan to remove the record of default from the borrower's credit history.

Recall and repurchase occurs for federal student loans after a loan is reported as defaulted and an event occurs that restores the loan to its prior status. In this case, the credit report must be updated in the same manner as a rehabilitated student loan.

Since defaulted federal student loans are reported as transferred, there is no clear "notice of default" to remove from the reported account.

If the student loan is rehabilitated, the new or previous lender should report the loan as a new account going forward. Payment history reported prior to the default should not be included with the new account.

IMPORTANT NOTE: Contact your data representatives at the consumer reporting agencies to ensure that previously-reported "defaults" have been removed.

FEDERAL LOANS –REPORTING GUIDELINES FOR POST-DEFAULT LOANS

The following guidance is specific to reporting by the guarantor or its servicer/agent. All fields within the Metro 2® Format are required to be reported for each account. The information below describes fields that require specific values.

- Do not report the account during the review period.
- Do not report the account if it is returned to the lender.
- Do not report the account if it was transferred to the guarantor due to a claim payment for any reason other than default for non-payment.
- Guaranty agencies should follow the reporting guidelines for Lender/Servicer/Secondary Market when reporting loans that are not guaranteed by the federal government.

Consumer Account Number Base Segment, Field 7	Report the new number as assigned by the guaranty agency. Note: Do not report the consumer's Social Security Number in whole or in part within the Consumer Account Number.
Portfolio Type Base Segment, Field 8	O (Open)
Date Opened Base Segment, Field 10	Report the date the defaulted claim was paid to the lender.
Highest Credit/Original Loan Amount Base Segment, Field 12	Report the claim amount that was paid to the lender.
Terms Duration Base Segment, Field 13	001 (one payment as scheduled)
Terms Frequency Base Segment, Field 14	Blank
Account Status Code Base Segment, Field 17A	<p>Report <i>only</i> the following:</p> <ul style="list-style-type: none"> • 93 = Account assigned to internal or external collections. (Account Status 93 should be reported immediately after the review period if the account is retained.) • 62 = Account paid in full/was a collection account. <p>Notes:</p> <p>If a consumer is making payments, continue to report the account with Account Status Code 93, but report the declining balance.</p> <p>If accounts are turned over to a Collection Agency and the Collection Agency reports the accounts to the credit reporting agencies, the guaranty agency should report the accounts as Status DA to delete them. These accounts cannot be reported by both agencies, causing duplication. The FCRA Compliance/Date of First Delinquency should contain the date of the first delinquency with the original lender that led to the default. The K1 Segment should contain the complete name of the original lender/servicer/secondary market to whom the claim was paid, as well as Creditor Classification Code 07.</p>

FEDERAL LOANS –REPORTING GUIDELINES FOR POST-DEFAULT LOANS

<p>FCRA Compliance/Date of First Delinquency (DOFD) Base Segment, Field 25</p>	<p>Report the date of the first delinquency <i>with the original lender</i> that led to the loan being transferred to the guaranty agency. If multiple defaults are reported as one loan (compressed), the Date of First Delinquency must be the date of the first delinquency that led to the earliest default.</p> <p>Note: Effective March 31, 2004, the FCRA¹ states that “provided that the consumer does not dispute the information, a person that furnishes information on a delinquent account that is placed for collection, charged for profit and loss, or subjected to any similar action, complies with this paragraph, if –</p> <p>(i) the person reports the same date of delinquency as that provided by the creditor to which the account was owed at the time at which the commencement of the delinquency occurred, the creditor previously reported that date of delinquency to a consumer reporting agency;</p> <p>(ii) the creditor did not previously report the date of delinquency to a consumer reporting agency, and the person establishes and follows reasonable procedures to obtain the date of delinquency from the creditor or another reliable source and reports that date to a consumer reporting agency as the date of delinquency; or</p> <p>(iii) the creditor did not previously report the date of delinquency to a consumer reporting agency and the date of delinquency cannot be reasonably obtained as provided in clause (ii), the person establishes and follows reasonable procedures to ensure the date reported as the date of delinquency precedes the date on which the account is placed for collection, charged to profit or loss, or subjected to any similar action, and reports such date to the credit reporting agency.”</p>
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¹ Fair Credit Reporting Act Section 623 (a) (5)

FEDERAL LOANS –REPORTING GUIDELINES FOR POST-DEFAULT LOANS

<p>Consumer Information Indicator Base Segment, Field 38; J1/J2 Segment, Field 11</p>	<p>Used to specify that a consumer’s student loan has been included in bankruptcy or a consumer cannot be located. Refer to Exhibit 11 in the Metro 2® Format for a list of available indicators.</p> <p>When a defaulted loan is included in a bankruptcy filing, the guaranty agency should report the account with Account Status 93 and the applicable bankruptcy CII.</p> <p>If the account is reported by the guaranty agency during the bankruptcy and is repurchased by the lender at the conclusion of the bankruptcy, the guaranty agency should report Account Status DA to delete the account.</p> <p>Notes: Refer to FAQ 23 for guidelines on reporting an account when a consumer files bankruptcy, but the student loan is not included in the bankruptcy discharge.</p> <p>Non-defaulted loans that were claim paid by the guaranty agency due to a bankruptcy should not be reported by the guaranty agency.</p>
<p>K1 Segment</p>	<p>Report the complete name of the lender to whom the claim was paid in the Original Creditor Name field. Also, report Creditor Classification Code 07 to indicate Educational.</p> <p>Note: The K1 Segment is required for all accounts reported, regardless of Account Status Code.</p>

FEDERAL LOANS –REPORTING GUIDELINES FOR POST-DEFAULT LOANS

Special Situations	
Rehabilitated loans	Report Account Status Code DA to delete the account when it is transferred to a lender. Note: The transferred account reported by the original lender will remain on file until purged according to FCRA guidelines.
Accounts sent to ED (Guaranty agencies only) (See row below for exception)	Report Account Status Code DA to delete the account.
Loans that have been Consolidated and Transferred to ED	Report Account Status Code 62 .
Accounts with a Balance and Consumer who is responsible for payments is deceased	Report Account Status Code 62 (paid account/was a collection account) and ECOA Code X . If date of death of the consumer who is responsible for payments is prior to the first reporting by the guaranty agency, do not report the account.
Accounts where student is deceased and the parent is responsible for payments	Report Account Status Code DA to delete the account.
Guaranty Agencies dissolving or undergoing bankruptcy	Contact the Consumer Data Industry Association (CDIA) to determine the appropriate steps in the reporting process that would be unique to the agency's specific situation.
Loans discharged due to school closure	Report Account Status Code DA to delete the account.
Loans discharged due to identity theft or, prior to discharge, when it is determined that the loan is the result of identity theft	Report Account Status DF to delete the account.
Loans that have an unpaid tuition refund	Report Account Status 62 and Special Comment AU. Note that the student paid the percentage of tuition owed and the remainder of the tuition was forgiven.

FEDERAL LOANS –REPORTING GUIDELINES FOR POST-DEFAULT LOANS

Total and Permanent Disability (TPD) Discharge Procedures for Non-defaulted FFELP Loans (Standard and VA)

Do not report the account when a TPD claim is filed on a non-defaulted loan.

Total and Permanent Disability (TPD) Discharge Procedures for Defaulted Loans (Standard and VA)

Initial indication of interest in TPD discharge by borrower	When notice is received from ED that the borrower has indicated interest in a TPD discharge, continue to report the account as in collections (Account Status Code 93).
Initial TPD application filed by borrower	When notice is received from ED that the borrower has applied for a TPD discharge, continue to report the account as in collections (Account Status Code 93).
TPD discharge not approved	If the discharge is not approved, continue reporting the account normally going forward.
TPD discharge approved	<p>Report the account with the following Base Segment fields:</p> <ul style="list-style-type: none"> Account Status Code = 62 (Paid in full/was a collection account) Note: If the TPD effective date is prior to the date the guaranty agency or ED began reporting the loan, report Account Status DA to delete the account. Current Balance and Amount Past Due = 0 Date of Account Information = Even though the Account Status is 62, report a date within the current month's reporting period. Date Closed = Date the TPD discharge was approved by ED. <p>Notes: If notified by the guaranty agency or ED that the TPD effective date was prior to default and during the period that a prior servicer was responsible for reporting the account, the prior servicer should follow the reporting guidelines outlined above in the Lender/Servicer/Secondary Market Reporting Guidelines.</p> <p>If a loan discharged under Standard TPD is reinstated within 3 years, a new account will have to be reported because the discharged account was reported as paid in full. If Account Status 93 is reported on the new account, the original Date of First Delinquency must be reported.</p>

FEDERAL STUDENT LOAN GLOSSARY OF TERMS

Borrower Defense to Repayment

Loan forgiveness for borrowers who took out federal student loans to attend a school if that school misled the borrower, or engaged in other misconduct in violation of certain state laws. The borrower must demonstrate that the school, through an act or omission, violated state law directly related to the borrower's federal student loan or to the educational services for which the loan was provided. In order for a student loan to be forgiven, the borrower must have approval from the U.S. Department of Education or a state court.

Closed School Loan Discharge

Relief for borrowers who could not complete their program because the school closed while they were enrolled or borrowers who withdrew not more than 120 days before the school closed. In order for a student loan to be discharged, the student must have approval from the U.S. Department of Education.

False Certification

Relief for borrowers for whom the school falsified the borrower's name on either the loan application or disbursement authorization, unless the student received the proceeds of the loan.

Grace Period

The period of time between the end of the initial in-school period and the date repayment of the student loan is expected to begin.

Guaranty Agency

A state or private nonprofit organization that has an agreement with the Secretary of the U.S. Department of Education, under which the organization will administer a student loan guarantee program under the Federal Family Education Loan Program (FFELP). The guaranty agency pays a claim to the original lender when a student defaults on a FFELP loan.

Income Driven Repayment (IDR) Plans

Federal student loans may be repaid under one of several repayment plans which sets the borrower's monthly student loan payment at an amount that is intended to be affordable based on the borrower's income and family size.

Initial In-School Period

The period of time immediately following the loan disbursement when the borrower is attending school and repayment is not required.

Lender

A bank, credit union, savings and loan association, insurance company, or other lending institution, which makes or holds loans under the Federal Family Education Loan Program (FFELP) and is subject to examination and supervision by an agency of the United States.

FEDERAL STUDENT LOAN GLOSSARY OF TERMS

Public Service Loan Forgiveness

Borrowers may be eligible for forgiveness of their Direct Loans if they make 120 monthly payments on the loans after Oct. 1, 2007, under certain repayment plans, while the borrower is employed full-time in a qualifying public service job. The borrower must not be in default and may not apply for forgiveness until after all of the required 120 qualifying monthly payments have been made.

Rehabilitated Loans

Federal student loans that were previously in collections with a guarantor or the U.S. Department of Education. The rehabilitation process requires that the student agree, in writing, to make nine voluntary, reasonable, and affordable monthly payments (as determined by the loan holder) within 20 days of the due date; and must make all nine payments during a period of 10 consecutive months. At that time, the loan can then be resold to a new lender or the original lender. When loans are rehabilitated, the original lender and guarantor are required to remove the record of default from the consumer's credit history. However, the credit history will still reflect late payments that were reported by the loan holder before the loan went into default.

Secondary Market

An entity which purchases student loan obligations from participating lenders in a secondary market and pays lenders par, premium or discount on the original principal balance of the note. A secondary market may also service the loans that it purchases.

Servicer

An organization that services (i.e., processes) a student loan debt following origination, to ensure due diligence of the debt with respect to enforcement of the terms of the promissory note as defined under Federal regulations. A servicer collects payments, responds to customer service inquiries, and performs other administrative tasks associated with maintaining a federal student loan on behalf of a lender.

Teacher Loan Forgiveness

A portion of the Federal Family Education Loan (FFEL) program whereby the Secretary of the U.S. Department of Education repays portions of student loans. To qualify, the student must meet certain criteria, such as teaching, nursing, or volunteering through the Peace Corps.

FEDERAL STUDENT LOAN GLOSSARY OF TERMS

Total and Permanent Disability Discharge

Relief for borrowers who provide one or more of the following types of documentation:

1) Documentation from the U.S. Department of Veterans Affairs (VA) showing that the VA has determined that the borrower is unemployable due to a service-connected disability; 2) Social Security Administration (SSA) notice of award for Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) benefits stating that the borrower's next scheduled disability review will be within five to seven years from the date of the borrower's most recent SSA disability determination; or 3) Certification from a physician that the borrower is totally and permanently disabled. The physician must certify that the borrower is unable to engage in any substantial gainful activity because of a medically determinable physical or mental impairment that can be expected to result in death, has lasted for a continuous period of not less than 60 months, or can be expected to last for a continuous period of not less than 60 months. In order for a student loan to be discharged, the borrower must have approval from the U.S. Department of Education.

Student Loan Reporting – Private Loans

GENERAL REPORTING GUIDELINES

Reporters of private student loan information include lenders, servicers and secondary markets.

The following reporting guidelines refer to all reporters of private student loan information:

- Report data in the standard Metro 2[®] Format, including the Header Record.
- Report all open accounts on a monthly basis.
- Report sold, transferred and paid accounts in the reporting period in which they are finalized.
- Do not report accounts prior to the first disbursement.
- Report the complete name, address, social security number and date of birth of the consumer.
- In the Identification Number field, report the internal code that identifies the lender or secondary market where information is verified. For servicers, the Identification Number should refer to the current loan owner/holder; e.g., Servicer Name/Loan Owner Name.
- All parties reporting credit information must respond to consumer inquiries.

Note: The guidelines in this document are specific to your industry and should be used in conjunction with specifications in the Metro 2[®] Format. Refer to the Metro 2[®] Format for detailed information on segments and field information.

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

All fields within the Metro 2® Format are required to be reported for each account. The information below describes fields that require specific values.

Do not report a loan until a disbursement has been made.

Identification Number Base Segment, Field 5	<p>For loans reported by a servicer, the Identification Number should refer to the current loan owner/holder or servicer and loan owner/holder; e.g., Servicer Name/Loan Owner Name.</p> <p>Note: Verification of accounts will be done with the servicer.</p>
Account Type Code Base Segment, Field 9	<ul style="list-style-type: none">• 12 (Education) for installment accounts with Portfolio Type I (Installment)• 15 (Line of Credit) for education line of credit accounts with Portfolio Type C (Line of Credit)
Highest Credit or Original Loan Amount Base Segment, Field 12	<p>The Highest Credit or Original Loan Amount should be increased for subsequent disbursements of a loan, and reduced for disbursements that are canceled or returned.</p> <p>Do not increase this amount as a result of interest capitalization or fees incurred post-disbursement.</p> <p>Note: Accounts with Account Type 12 report the original amount of the loan. Accounts with Account Type 15 report the Highest Credit Amount.</p>
Terms Duration Base Segment, Field 13	<p>For installment loans, report the maximum number of months allowed for repayment of the loan.</p> <p>For line of credit accounts, report a constant of LOC.</p> <p>When the loan is in a period during which payments are not required (i.e., initial in-school, grace, deferment, and forbearance periods), report Terms Duration as blank.</p> <p>For loans that are reported as in collections (Account Status 93 or 62) or charged off (Account Status 97 or 64), continue to report Terms Duration normally. Do not report a constant of 001.</p>

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Account Status Code Base Segment, Field 17A</p>	<ul style="list-style-type: none"> • 11 = Open account in good standing <p>For those private student loans that are subject to delayed delinquency reporting based on loan holder requirements, Account Status 11 should be reported until the loan is 60 days past the due date as of the Date of Account Information.</p> <ul style="list-style-type: none"> • 11 with Terms Frequency D and Payment History Profile Character B = Open account/payments deferred/account was never in repayment • 11 with Terms Frequency D and Payment History Profile Character D = Open account/payments deferred/account was previously in repayment or was previously reported as in repayment <p>Note: Terms Frequency Code D should be used with Account Status Code 11 and Amount Past Due = 0 when payments are not currently required (e.g., deferment, grace period, forbearance), but there is a future payment obligation.</p> <ul style="list-style-type: none"> • 71, 78, 80, 82–84 = the appropriate stage of delinquency (30 days to 180 or more days past the due date). Refer to Account Status 11 above for exceptions due to delayed delinquency reporting. • 13 = Paid/zero balance account (requires Payment Rating) <p>Note: For paid in full accounts, report the Date Closed. Also, report both the Current Balance and the Amount Past Due as zero. Refer to Frequently Asked Question and Answer 39 for additional guidance on reporting accounts that are paid in full.</p> <ul style="list-style-type: none"> • 93 = Account assigned to internal or external collections • 97 = Unpaid balance reported as a loss (charge-off) • 62 = Account paid in full, was a collection account • 64 = Account paid in full, was a charge-off • DA = Delete entire account • DF = Delete entire account due to confirmed fraud <p>Note: Refer to guidance throughout this module for specific situations on deleting accounts.</p>
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PRIVATE STUDENT LOANS – LENDER SERVICER/SECONDARY MARKET

Payment History Profile Base Segment, Field 18	<p>Refer to Metro 2® Format module for standard guidelines on reporting up to 24 months of payment history.</p> <p>The Payment History Profile will reflect accounts going from current to 30 days delinquent or from current to 60 days delinquent due to delayed delinquency reporting (refer to Account Status 11 above).</p> <p>Examples:</p> <ul style="list-style-type: none">• 332100000001221000000000 (first reported delinquent at 30 days)• 332000000002200000000000 (first reported delinquent at 60 days) <p>For months during which payments were not required (i.e., initial in-school, grace, deferment and forbearance periods):</p> <ul style="list-style-type: none">• Report value D for loans that were previously in repayment.• Report value B for loans that have never been in repayment. <p>Note: If payment history was reported in error (i.e., account mistakenly reported as in repayment), report value D.</p> <p>When adjusting the initial in-school or grace period status of a loan that covers one or more months previously reported in the Payment History Profile, the applicable months should be updated to reflect character D (no payment history available this month).</p>
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PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Special Comment Base Segment, Field 19</p>	<p>The Special Comments that apply to private student loans are listed below. No other codes may be reported.</p> <ul style="list-style-type: none"> • O – when reporting a transfer to another servicer that is not due to a loan sale. Refer to Frequently Asked Question and Answer 46 for additional reporting guidance. • AC – when the borrower is paying under a partial payment agreement • AH – when a loan is purchased by another company. Refer to Frequently Asked Question and Answer 47 for additional reporting guidance. • AM – when account payments are assured by wage garnishment (used when payments are being made through wage garnishment on an account that has been charged off or is in collections) • AS – when the account is closed due to an internal refinancing. Refer to Frequently Asked Question and Answer 42 (option 3) for additional reporting guidance. • AT – when reporting an internal transfer that results in a new tradeline. Refer to Frequently Asked Question and Answer 46 for additional reporting guidance. • AU – when a loan is paid in full for less than the full balance. Refer to Frequently Asked Question and Answer 38 for additional reporting guidance. • AW – when the borrower is affected by a natural or declared disaster. Refer to Frequently Asked Question and Answer 58 for additional reporting guidance. • BT – when the borrower is required to make interest-only payments under the terms of the promissory note (e.g., a requirement to make interest-only payments during the initial in-school period). • CH – when loan payments have been guaranteed or insured • CO – when the loan has been permanently modified <p>Additionally, the following Special Comments may be reported for Lines of Credit accounts (Account Type 15):</p> <ul style="list-style-type: none"> • M – when the account is closed at credit grantor's request • AP – when the credit line is suspended • CJ – when the credit line is no longer available – account is in the repayment phase. Refer to Exhibit 6 or 7 for reporting guidance. <p>Note:</p> <p>Special Comment Code CP (Forbearance) should not be used for private student loans. Forbearance should be reported similarly to deferment, as per FAQ 44.</p>
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PRIVATE STUDENT LOANS – LENDER /SERVICER/SECONDARY MARKET

FCRA Compliance/Date of First Delinquency (DOFD) Base Segment, Field 25	<p>Refer to Metro 2® Format module and Exhibit 9 (Explanation and Examples of FCRA Compliance/Date of First Delinquency) for standard guidelines on reporting DOFD according to hierarchy rules.</p> <p>Regarding hierarchy rules 1 and 2: Report the date of the first 30-day delinquency that led to the Account Status or Payment Rating being reported even though reporting of delinquency may be delayed until the loan is 60 days past the due date because the loan is subject to delayed delinquency reporting. When the Account Status is 11 (Current), zero fill the Date of First Delinquency. However, when reporting delinquent statuses, do not change/update the Date of First Delinquency unless the borrower has brought the account back to less than 30 days past the due date. A borrower may be less than 60 days past the due date (i.e., Account Status 11) without triggering a change to the Date of First Delinquency.</p> <p>(Example on next page)</p>
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PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

FCRA Compliance/Date of First Delinquency (DOFD) Base Segment, Field 25 (continued)		Example: Refer to table below for example of DOFD reporting for loans that may not be reported as delinquent until 60 days past the due date.		
Date of Account Information (Field 24)	Next Payment Due Date (not reported)	# of Days Past Due Date (not rptd.)	Account Status and Definition (Field 17A)	Date of First Delinquency (Field 25)
03/31/2019	04/15/2019	0	11 (Current)	Zero fill
04/30/2019	04/15/2019	15	11	Zero fill
05/31/2019	04/15/2019	46	11	Zero fill
06/30/2019	04/15/2019	76	78 (60-89 days past due date)	05/15/2019 (30 days after 04/15/2019 due date)
07/31/2019	04/15/2019	107	80 (90-119 days past due date)	05/15/2019 (30 days after 04/15/2019 due date)
08/31/2019	06/15/2019	77	78	05/15/2019 (30 days after 04/15/2019 due date)
09/30/2019	06/15/2019	107	80	05/15/2019 (DOFD does not reset; borrower never less than 30 days delinquent)
10/31/2019	08/15/2019	77	78	05/15/2019 (30 days after 04/15/2019 due date)
11/30/2019	10/15/2019	46	11	Zero fill
12/31/2019	12/15/2019	16	11	Zero fill (Borrower less than 30 days delinquent; DOFD will reset if future delinquency)
01/31/2020	12/15/2019	47	11	Zero fill
02/28/2020	12/15/2019	75	78	01/14/2020 (30 days after 12/15/2019 due date)
03/31/2020	12/15/2019	106	80	01/14/2020 (30 days after 12/15/2019 due date)

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

Consumer Information Indicator Base Segment Field 38 J1 and J2 Segments – Field 11	Used to specify that a consumer's student loan has been included in bankruptcy or a consumer cannot be located. Refer to Exhibit 11 for a list of available indicators. Note: Refer to FAQ 23 for guidelines on reporting an account when a consumer files bankruptcy, but the student loan is not included in the bankruptcy discharge.
K4 Segment Deferred Payment information	Report for deferred loans: <ul style="list-style-type: none"> • Specialized Payment Indicator = 02 (Deferred payment) • Deferred Payment Start Date = date the first payment is due. If not available, report the date on which the deferred period will end. Note: If neither date is available, do not report the K4 Segment.
L1 Segment Consumer Account Number Change	When account history can be verified, report one time when account numbers change due to an account acquisition or internal account number change. Refer to FAQ 46 (option 2) for guidelines on reporting when account history cannot be verified by the new servicer.

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

Single, Multiple and Refinanced Loans, Deferment or Forbearance, Loan Sales and Transfers, Co-Signer Release, Loan Defaults	
Multiple disbursements of a single loan	<p>When a loan has multiple disbursements, report the loan as one account.</p> <ul style="list-style-type: none"> • Retain and do not change the original Consumer Account Number when additional disbursements are reported. • Retain and do not change the original Date Opened after the loan is reported. • Update the Original Loan Amount, Current Balance, and Scheduled Monthly Payment Amount (when in repayment) as applicable, to include totals for all disbursements. Reduce these amount fields as applicable, due to the amount of any canceled or returned disbursements. <p>Example: If the loan is for \$10,000 and the first disbursement is for \$2,000, report the Original Loan Amount field as \$2,000. If an additional disbursement is made for \$8,000, increase the Original Loan Amount to \$10,000. If the \$2,000 disbursement is subsequently canceled, reduce the Original Loan Amount to \$8,000.</p> <ul style="list-style-type: none"> • If all disbursements are canceled or returned, report Account Status DA to delete the account.
Multiple loans	Multiple loans must be reported as separate accounts.
Refinanced loans	<p>Internal Refinancing: Refer to Frequently Asked Question and Answer 42 for reporting guidance.</p> <p>External Refinancing: When a loan is paid in full through refinancing, the original lender should report the loan with Account Status Code 13 and the appropriate Payment Rating.</p> <p>The new refinanced loan, which paid the underlying loans in full, must be reported as a new account.</p>
Loans in deferment or forbearance when no payments are due	Report private student loans in deferment or forbearance as deferred. Refer to Frequently Asked Question and Answer 44 for specific reporting guidance.

(continued)

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

Loans sold <u>to</u> another company	Follow the standard guidelines in Frequently Asked Question and Answer 47 for loans sold to another company. Report Special Comment Code AH .
Loans transferred <u>to</u> another servicer or lender	Follow the standard guidelines in Frequently Asked Question and Answer 46 for servicing transfers. If FAQ 46 option 2 is followed, report Special Comment Code O (Account transferred to another company/servicer).
Loans purchased <u>from</u> another servicer or lender	Follow the standard guidelines in Frequently Asked Question and Answer 48 for transfers in as a result of a loan purchase.
Loans transferred in <u>from</u> another servicer or lender	Follow the standard guidelines in Frequently Asked Question and Answer 46 for servicing transfers. Do not change the Date Opened; report the date opened with the original servicer.
Release of Co-Signer	If the co-signer of the private student loan is released from further liability on the loan, report ECOA Code T (Terminated) for the co-signer and discontinue reporting the co-signer going forward.

(continued)

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Private student loans that are transferred back to the lender by the servicer at the lender's request at the time of default¹</p>	<p>Follow the standard guidelines in Frequently Asked Question and Answer 46 for servicing transfers. If option 2 is followed, report Special Comment Code O (Account transferred to another company/servicer).</p> <p>Options available to the servicer transferring the loan to the loan holder:</p> <ul style="list-style-type: none"> • Report Account Status Code 97 with the applicable Special Comment Code if the loan was charged off at the time of transfer. • Report Account Status Code 93 if in collections at the time of transfer. <p>The loan holder receiving the loan from the servicer should report the account as a new tradeline.</p> <p>Options available for the loan holder receiving the loan from the servicer:</p> <ul style="list-style-type: none"> • Report Account Status Code 97 if the loan is a charge off. • Report Account Status Code 93 if the account is in collections.
<p>Private student loans that are not transferred to the lender by the servicer at the time of default¹</p>	<p>If the loans have been charged off, follow the standard guidelines in Frequently Asked Questions and Answers 34 or 65, as applicable.</p> <p>Loans that are in collections should be reported with Account Status 93 and the Current Balance and Amount Past Due = outstanding balance amount. Account Status 62 should be reported when the loan is paid in full.</p> <p>In both situations, if the account is settled for less than the outstanding balance, follow the guidance in Frequently Asked Question and Answer 38, which requires reporting Special Comment Code AU along with the applicable paid status.</p>

¹ Refer to the Private Student Loan Glossary of Terms at the end of this section for the standard definition of "default" as it applies to private student loans.

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

Write-off of Private Student Loan Balances due to Death or Disability: For private student loans, write-off reporting requirements apply following approval by the loan holder. Practices among private loan lenders vary as to write-off options.	
Write-off of loan due to the death of a student who is not a party to the loan (e.g., private student loan that is made to a parent)	<p>If the loan had been in repayment prior to the student's death, report Account Status Code 13, Payment Rating 0, Current Balance 0, and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed. The Payment History Profile should be updated to reflect value D for months between the date of death and the reporting period in which the loan is reported with Account Status Code 13.</p> <p>If the loan was in collections or charged off at the time of the student's death, report Account Status Code 62 or 64 as appropriate, plus Current Balance 0 and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed.</p> <p>If payments on the loan were not yet required, the tradeline should be deleted. Report Account Status Code DA to delete the account.</p> <p>ECOA Code X should not be reported because the student who is deceased is not a party to the loan. ECOA Code X must be reported only when a party to the loan is deceased. Refer to Frequently Asked Question and Answer 19 for reporting when a party to the loan is deceased.</p>
Write-off of loan due to the death of a party to the loan	<p>If the loan had been in repayment prior to the death of a party to the loan, report Account Status Code 13, Payment Rating 0, Current Balance 0, and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed. Report ECOA Code X in the applicable Base or J1/J2 Segment for the deceased party as described in Frequently Asked Question and Answer 19.</p> <p>If the loan was in collections or charged off at the time of the party's death, report Account Status Code 62 or 64 as appropriate, plus Current Balance 0 and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed.</p> <p>If payments on the loan were not yet required, the tradeline should be deleted. Report Account Status Code DA to delete the account.</p> <p>Note: When there are multiple parties to the loan (e.g., borrower and co-signer), the death of the co-signer may not cause the loan to be written off and the borrower may continue to be obligated. In that instance, report ECOA Code X for the co-signer and continue to report the account for the borrower.</p>

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Write-off of loan due to disability of the borrower</p>	<p>If a write-off due to disability is granted by the lender, report the account as follows:</p> <ul style="list-style-type: none"> • If the effective date of the disability is prior to the date the loan entered repayment, or is prior to the date that the lender or servicer began reporting the loan, report Account Status DA to delete the account. • If the loan had been in repayment prior to the effective date of the borrower's disability, report Account Status Code 13, Payment Rating 0, Current Balance 0 and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed. <p>The Payment History Profile should be updated to reflect value D (no payment history available this month) for months between the effective date of the disability and the reporting period in which the loan is reported with Account Status 13. Adjustments to months earlier than the previous 24 months prior to the Date of Account Information must be corrected by submitting an AUD through e-OSCAR®.</p> <p>Note: The effective date of the disability write-off will vary according to lender policy. Common triggers include the date of the doctor's certification, the date the lender receives the disability request, or the date the lender approves the disability request. Any delinquencies that occurred prior to the effective date of the disability should remain on the file and should not be deleted.</p> <p>Date of Account Information = Report a date within the current month's reporting period even if the paid effective date was in a prior month. Refer to Frequently Asked Question and Answer 39.</p> <p>Date Closed = Date the disability write-off was approved by the lender.</p> <ul style="list-style-type: none"> • If the loan was in collections or charged off at the time of the effective date of the borrower's disability, report Account Status Code 62 or 64 as appropriate, plus Current Balance 0 and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed.
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PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

Rehabilitated Private Student Loans

Section 623(a)(1) of the Fair Credit Reporting Act [15 U.S.C. 1681s-2(a)(1)] was amended by the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA) to provide that, a consumer may request a lender to remove from a consumer report a reported “default” regarding a private student loan, and such information shall not be considered inaccurate, if the lender chooses to offer a private student loan rehabilitation program that meets the requirements of section 623(a)(1). The term “default” as used in EGRRCPA is not a defined term for purposes of private student loans, but the student loan industry generally regards loans that are either in collections (Account Status Code 93) or charged off (Account Status Code 97) as being in default.

Note: Refer to the Private Student Loan Glossary of Terms at the end of this section for the standard definition of “default” as it applies to private student loans.

Reporting guidance on following pages.

PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Rehabilitated private student loan that had been transferred back to the lender at the lender's request at time of default and returns to the same servicer post-rehabilitation</p>	<p><u>Servicer reporting:</u></p> <p>If the servicer's Account Number is changed from the original number, report an L1 Segment.</p> <p>Follow the guidance below depending on the Account Status Code previously reported:</p> <ul style="list-style-type: none"> • If the servicer had previously reported a loan as charged-off using Account Status Code 97, the servicer must remove the Account Status Code 97 and the Payment History Profile code L if the loan is later rehabilitated. Begin reporting Account Status Code 11 once the loan is rehabilitated. • If the servicer had previously reported a loan as being in collections using Account Status Code 93, the servicer must remove the Account Status Code 93 and the Payment History Profile code G if the loan is later rehabilitated. Begin reporting Account Status Code 11 once the loan is rehabilitated. <p>Payment History Profile = In both situations described above, report value D (no payment history available this month) in the positions representing the months going back to the effective date of the rehabilitation. Adjustments to months earlier than the previous 24 months prior to the Date of Account Information must be corrected by submitting an AUD through e-OSCAR®.</p> <p>Note: If the servicer had only reported the account as delinquent, using the Account Status Code applicable to the level of delinquency, and has not reported the loan as in collections (Account Status Code 93) or as a charge-off (Account Status Code 97), no changes to prior reporting are needed if the loan is later rehabilitated. Begin reporting Account Status Code 11 once the loan is rehabilitated.</p> <p><u>Lender reporting:</u></p> <p>If the lender reported either Account Status Code 93 (in collections) or Account Status Code 97 (charge-off) during the period that it held the loan, the tradeline should be deleted when the loan is successfully rehabilitated by reporting Account Status Code DA.</p>
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PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

<p>Rehabilitated private student loan that had been transferred back to the lender at the lender's request at the time of default and is assigned to a different servicer post-rehabilitation</p>	<p><u>Former Servicer reporting:</u></p> <ul style="list-style-type: none"> • If the servicer had previously reported a loan as charged-off using Account Status Code 97, the servicer must remove the Account Status Code 97 and the Payment History Profile code L if the loan is later rehabilitated. • If the servicer had previously reported a loan as being in collections using Account Status Code 93, the servicer must remove the Account Status Code 93 and the Payment History Profile code G if the loan is later rehabilitated. <p>Payment History Profile = In both situations described above, report value D (no payment history available this month) in the positions representing the months going back to the effective date of the rehabilitation. Adjustments to months earlier than the previous 24 months prior to the Date of Account Information must be corrected by submitting an AUD through e-OSCAR®.</p> <p>Note: If the servicer had only reported the account as delinquent, using the Account Status Code applicable to the level of delinquency, and had not reported the loan as in collections (Account Status Code 93) or as a charge-off (Account Status Code 97), no changes to prior reporting are needed if the loan is later rehabilitated.</p> <p><u>New Servicer reporting:</u></p> <p>If the private student loan is rehabilitated, the new lender/servicer should report the loan as a new account going forward. Payment history reported prior to the default should not be included with the new account.</p> <p><u>Lender reporting:</u></p> <p>If the lender reported either Account Status Code 93 (in collections) or Account Status Code 97 (charge-off) during the period that it held the loan, the tradeline should be deleted when the loan is successfully rehabilitated by reporting Account Status Code DA.</p>
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PRIVATE STUDENT LOANS – LENDER/SERVICER/SECONDARY MARKET

Rehabilitated private student loan that continued to be held by the servicer and was not transferred back to the lender at the lender's request at time of default	<p><u>Servicer reporting:</u></p> <p>If the servicer's Account Number is changed from the original number, report an L1 Segment.</p> <p>Follow the guidance below depending on the Account Status Code previously reported:</p> <ul style="list-style-type: none">• If the servicer had reported a loan as charged-off using Account Status Code 97, the servicer must remove the Account Status Code 97 and the Payment History Profile code L if the loan is later rehabilitated. Begin reporting Account Status Code 11 once the loan is rehabilitated.• If the servicer had reported a loan as being in collections using Account Status Code 93, the servicer must remove the Account Status Code 93 and the Payment History Profile code G if the loan is later rehabilitated. Begin reporting Account Status Code 11 once the loan is rehabilitated. <p>Payment History Profile = In both situations described above, report value D (no payment history available this month) in the positions representing the months going back to the effective date of the rehabilitation. Adjustments to months earlier than the previous 24 months prior to the Date of Account Information must be corrected by submitting an AUD through e-OSCAR®.</p> <p>Note: If the servicer had only reported the account as delinquent, using the Account Status Code applicable to the level of delinquency, and had not reported the loan as in collections (Account Status Code 93) or as a charge-off (Account Status Code 97), no changes to prior reporting are needed if the loan is later rehabilitated. Begin reporting Account Status Code 11 once the loan is rehabilitated.</p>
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PRIVATE STUDENT LOAN GLOSSARY OF TERMS

Charge-off

Private student loan lenders employ various criteria as to when they may consider a loan charged off. The period of time from delinquency to charge off varies from 60 days to 221 days, with 120 days delinquent being a common period used by private student loan lenders.

Default

The term "default" is not a defined term for purposes of private student loans as it is for federal student loans, but it is used as the trigger for private loan rehabilitation in the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA), which amends section 623(a)(1) of the Fair Credit Reporting Act (FCRA). The student loan industry and the consumer reporting industry have agreed on the following standard definition of default as it applies to private student loans. A private student loan is considered to be "defaulted" when (1) it is placed in collections (Account Status Code 93) or (2) when it is charged off (Account Status Code 97).

Disability Write-off (Reduction/elimination of the outstanding loan balance)

Some lenders may offer relief for borrowers who provide documentation of disability; the lender may write off or forgive the loan. These programs may be modelled on the Department of Education's criteria for total and permanent disability (TPD) discharge, or the lender may employ its own criteria. The effective date of the write-off may vary as well; some lenders employ the date that a doctor provided a certificate of disability, while others use the date that the lender approved the disability write-off.

Grace Period

For some private student loans, the period of time between the end of the initial in-school period and the date repayment of the student loan is expected to begin.

Initial In-School Period

For some private student loans, the period of time immediately following the loan disbursement when the borrower is attending school and repayment is not required.

Lender

A bank, credit union, savings and loan association, insurance company, state agency, non-profit organization, or other lending institution, which makes or holds private student loans.

Rehabilitated Loans

Section 623(a)(1) of the Fair Credit Reporting Act [15 U.S.C. 1681s-2(a)(1)] was amended by the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA) to provide that, a consumer may request a lender to remove from a consumer report a reported "default" regarding a private student loan, and such information shall not be considered inaccurate, if the lender chooses to offer a private student loan rehabilitation program that meets the requirements of section 623(a)(1). The term "default" as used in EGRRCPA is not a defined term for purposes of private student loans, but the student loan industry generally regards loans that are either in collections (Account Status Code 93) or charged off (Account Status Code 97) as being in default.

PRIVATE STUDENT LOAN GLOSSARY OF TERMS

Secondary Market

An entity which purchases student loan obligations from participating lenders in a secondary market and pays lenders par, premium or discount on the original principal balance of the note. A secondary market may also service the loans that it purchases.

Servicer

An organization that services (i.e., processes) a student loan debt following origination, to ensure due diligence of the debt with respect to enforcement of the terms of the promissory note as defined under Federal regulations. A servicer collects payments, responds to customer service inquiries, and performs other administrative tasks associated with maintaining a federal or private student loan on behalf of a lender.

Write-off

Some lenders may write off the outstanding balance of a private student loan under certain circumstances such as the death or disability of the borrower. Policies vary from lender to lender. This document uses the term “write-off” for consistency’s sake but be aware that different lenders may use various terms such as write-off or forgiveness or discharge to describe the process. Forgiveness or discharge of private student loans should not be confused with forgiveness and discharge in the federal student loan programs. And write-off is not the same as charge-off; it is merely the reduction/elimination of the outstanding loan balance on the lender’s books.

Utility Company Reporting

GENERAL REPORTING GUIDELINES

Reporters of utility company data include Energy companies (e.g., coal and wood dealers, electric light and power, fuel oil distributors, gas companies — natural and bottled, etc.), Communications companies (e.g., telephone, cable, etc.) and Service companies (e.g., water, garbage, rubbish and other disposal companies, etc.).

The following reporting guidelines apply to all reporters of utility company data:

- Report data in the standard Metro 2[®] Format, including the Header Record.
- Report all current and delinquent open accounts on a monthly basis.
- Report closed accounts at the end of the month in which they occur.
- Report the complete name, address, social security number, and date of birth of the legally liable consumer(s).
- Report the telephone number, when available.
- Report the ECOA Code to designate the account as joint, individual, etc. in compliance with the Equal Credit Opportunity Act (ECOA).
- Report the Payment History Profile, which provides up to 24 months of payment history, in order to control and maintain the payment history.
- In the Identification Number field, report the internal code that identifies the utility company where information is verified.
- All parties reporting credit information must respond to consumer inquiries.
- All parties reporting credit information must comply with the Fair Credit Reporting Act and any applicable state laws.

Note: The guidelines in this document are specific to your industry and should be used in conjunction with the specifications in the Metro 2[®] Format. Refer to the Metro 2[®] Format for detailed information on segments and field information.

UTILITY COMPANY REPORTING GUIDELINES

1. Consumer Account Number (Base Segment, Field 7)

- Report the individual's complete and unique account number as extracted from your file.
- If a consumer has multiple accounts, the account numbers must be unique. If necessary, append a unique identifier to the original account number for each account.
- If the account number changes, report the L1 Segment. See field definitions in the Metro 2[®] Format.

Note: Notify your local consumer reporting agencies the first time L1 Segments are reported.

2. Portfolio Type (Base Segment, Field 8)

- O (Open) - for all utility services' payment plans
- I (Installment) - for merchandise (e.g., appliances, etc.)

3. Account Type Codes (Base Segment, Field 9)

- 92 (Utility Company) - for all utility services' payment plans
- 06 (Installment Sales Contract) - for merchandise (e.g., appliances, etc.)
- 4D (Telecommunications/Cellular) - for telecommunications companies, as appropriate

4. Highest Credit or Original Loan Amount (Base Segment, Field 12)

- For utility services' accounts, report the highest amount of credit utilized by the consumer.
- For Installment accounts, report the amount of the contract.

5. Terms Duration (Base Segment, Field 13)

- For utility services' accounts, report Terms Duration as 001.
- For Installment accounts, report the number of months of the contract.

6. Terms Frequency (Base Segment, Field 14)

- For utility services' accounts, blank fill.
- For Installment accounts, report the frequency for payments due.

UTILITY COMPANY REPORTING GUIDELINES

7. Scheduled Monthly Payment Amount (Base Segment, Field 15)
 - For utility services' accounts, zero fill.
 - For Installment accounts, report the regularly scheduled monthly payment amount.
8. Account Status Codes (Base Segment, Field 17A) and Payment Ratings (Base Segment, Field 17B)
 - Report full file information, including open/current accounts (Status Code 11), all stages of delinquency (Status Codes 71, 78, 80, 82–84), derogatory accounts (Status Codes 93, 95–97) and closed or paid accounts (Status Codes 13, 61–64). When the Account Status Code is 13 or 95, the Payment Rating must also be reported.
 - Refer to Exhibit 4 in the Metro 2[®] Format for specific definitions of Account Status Codes.
9. Report Special Comments (Base Segment, Field 19) in conjunction with Account Status Codes to further define the accounts. Refer to Exhibits 6 and 7 for specific code definitions.

When a utility service is terminated due to nonpayment, Special Comment M (Account Closed at Credit Grantor's Request) should be reported with the appropriate Status Code.

If the account is subsequently reinstated, remove the Special Comment M by blank filling the field.

10. Report Compliance Condition Codes (Base Segment, Field 20) when required for legal compliance. Refer to Exhibit 8 for specific code definitions.

Example: Compliance Condition Code XB (Account information has been disputed by the consumer directly to the data furnisher under the FCRA; the data furnisher is conducting its investigation.)

Important Note: Code XB should no longer be reported after the investigation is completed; the XB should be removed by reporting the removal code or changed to another code.

11. Current Balance (Base Segment, Field 21)

For all accounts, report the outstanding balance amount.

12. Amount Past Due (Base Segment, Field 22)

For delinquent or derogatory accounts, report the dollar amount past due.

e-OSCAR®

ABOUT e-OSCAR®

Access to e-OSCAR®, the **O**nline **S**olution for **C**omplete and **A**ccurate **R**eporting, is through a secure website. Each data furnisher has a unique registration and all users have their own user id and password. For more information on e-OSCAR®, visit <http://www.e-OSCAR.org>.

CONSUMER DISPUTE PROCESS

The Fair Credit Reporting Act (FCRA) guarantees consumers the right to dispute information that has been previously reported to consumer reporting agencies. See sections 611 and 623.

The consumer may initiate his or her dispute directly with a consumer reporting agency, a reseller of consumer reports or directly with the data furnisher. ***Regardless of the source at which the dispute originates, the data furnisher must respond.*** (See Federal Trade Commission interpretation letter of July 1999 <http://www.ftc.gov/os/1999/08/faresletterfinal.htm>).

The law also describes these duties of data furnishers specific to the consumer dispute process:

- Conduct an investigation with respect to the disputed information.
- Review all relevant information provided by the consumer and the consumer reporting agency.
- Report the results of the investigation to the consumer reporting agency.
- If the investigation finds that the information is incomplete or inaccurate, report those results to all other consumer reporting agencies to which the data provider furnished the information.

NOTE: After completion of a dispute investigation, it is imperative that data furnishers update their internal records to avoid re-reporting incorrect information.

The law also mandates a deadline for the completion of the investigation, review, and reporting of the investigation results. Per the FCRA, the consumer's dispute investigation must be completed within 30 days (45 days for FACT Act report). The time ***begins when the consumer contacts the consumer reporting agency.*** See sections 623 (b) (2) and 611 (a) (1).

e-OSCAR® Consumer Dispute Process

AUTOMATED CONSUMER DISPUTE VERIFICATION (ACDV)

In compliance with FCRA section 611 (a) (5) (D), the consumer credit reporting industry maintains an automated dispute resolution system. This system, called e-OSCAR®, is available for use by all data furnishers.

ACDV WORKFLOW

- Each consumer reporting agency and data furnisher has its own access to e-OSCAR®.
- When a consumer contacts a consumer reporting agency with a dispute, the agency transmits the disputed information and, if applicable, one or more images of relevant, consumer-provided documentation through e-OSCAR®. The data furnisher accesses e-OSCAR® and retrieves the disputed data and any associated document image(s). A possible exception to this process is when a consumer reporting agency updates the disputed item based on the information provided by the consumer (i.e., a valid police report). In this case, a dispute may not be transmitted via an ACDV.
- The data furnisher researches the disputed account and transmits a response back to the originating consumer reporting agency via e-OSCAR®. If the information is verified as correctly reported, the response goes only to the originating consumer reporting agency. If the information is modified or deleted, e-OSCAR® automatically sends a response to the originating consumer reporting agency and sends carbon copies to any other consumer reporting agencies with which the data furnisher's registration is active in e-OSCAR®.

Note: Responding to disputes varies from automated data reporting because when replying to a dispute, a data furnisher may be required to update historical account information. Dates and other account fields may need to be adjusted. For that reason, in some cases, data furnishers may not be able to follow the guidance published in the Credit Reporting Resource Guide®, which is intended for regular monthly updates to previously-reported accounts.

e-OSCAR® Consumer Dispute Process

- The consumer reporting agencies receive responses, update the credit files accordingly and respond back to the consumers.
- The originating consumer reporting agency also notifies the data furnisher via e-OSCAR of any account modifications or deletions as a result of the dispute reinvestigation. These notifications may include, if applicable, one or more images of relevant, consumer-provided documentation.
- **To complete the process, when a change has been made, data furnishers must also update their internal records to avoid re-reporting incorrect information.**

e-OSCAR® Consumer Dispute Process

FEATURES OF ACDV

- **Automatic Carbon Copies** – If a data furnisher modified or deleted an account in response to a consumer reporting agency-generated consumer dispute, e-OSCAR® will send copies of the dispute and response to each of the consumer reporting agencies with which the data furnisher's registration is active in e-OSCAR®. These copies help to pre-empt future disputes, thus reducing the data furnisher's costs. Consumer credit data may be modified at all the agencies with which the data furnisher's registration is active in e-OSCAR®, which will help to improve consumer satisfaction.
- **Automatic Notification** – The Fair Credit Reporting Act requires the originating consumer reporting agency to notify the data furnisher of any modifications or deletions as a result of the dispute reinvestigation. e-OSCAR® provides the capability to meet this requirement. See section 623 (b) (1) (D).
- **Enhanced "Update" Response Codes** – The ACDV Response Codes have been enhanced with more descriptive "update" response options now available, allowing the data furnisher to identify the type(s) of information the data furnisher has updated. In addition, e-OSCAR® reporting features now include the enhanced "update" responses to provide the data furnisher with additional insight and tracking.
- **No Illogical Conditions** — Information within a dispute response must be complete and logical. The e-OSCAR® system has built-in edits to prevent illogical responses.
- Other benefits include easy tracking of consumer disputes in progress or completed and easy access to a broad range of user reports.

e-OSCAR®

THE UPDATE PROCESS

From time to time, data furnishers will find it necessary to update account information they have reported to the consumer reporting agencies. The need to modify existing account information may come about as a result of consumer contact or through internal processes.

The Automated Universal Data Process (AUD) is used for interim maintenance requests to report updates to an account or to delete an account. AUD transactions are submitted through e-OSCAR®.

Reporting inaccuracies must be corrected promptly in order to comply with the Fair Credit Reporting Act. See section 623 (a) (2) (B).

AUTOMATED UNIVERSAL DATA PROCESS VIA e-OSCAR®

- The intent of the e-OSCAR® AUD process is to provide the consumer reporting agencies with a request to correct or delete a consumer's account. e-OSCAR® may not be used to add/create an account or to provide updates to a consumer's Personally Identifiable Information.
- When a consumer contacts a data furnisher and requests a change of information that has been previously reported, the data furnisher researches the account. If the data furnisher verifies that the account information in question needs to be modified, the company will use the e-OSCAR® system to complete an AUD.

e-OSCAR® Update Process

- The AUD process allows data furnishers to modify existing account information, or to delete the entire account from a consumer's credit report. A data furnisher may update a consumer's account information by submitting an Automated Universal Data (AUD) record. The data furnisher uses the system's web-based interactive interface to create the AUD record. The record is routed to one or more consumer reporting agencies, based on the reporting relationships indicated by the data furnisher within e-OSCAR® and based on the subscriber codes specified in the AUD record.
- The consumer reporting agencies receive their AUDs from e-OSCAR® and update the consumers' files as appropriate per their internal business processes.
- The originating consumer reporting agency notifies the data furnisher via e-OSCAR® of the outcome of each submitted AUD.
- **To complete the process, when a change has been made, data furnishers must also update their internal records to avoid re-reporting incorrect information.**

FEATURES OF AUD

- **Ability to send to multiple CRAs** – Each data furnisher indicates an affiliation with one or more of the consumer reporting agencies at the time of registration. This affiliation can be updated at any time. If the data furnisher modifies or deletes an account using the AUD process, e-OSCAR® sends the update to the consumer reporting agencies that the data furnisher designates when it submits the AUD. The data furnisher has the choice because it may not need to update an account on each of the consumer reporting agencies' databases. See section 623 (a) (2) (B) for information on the data furnisher's duty to correct and update information.
- **No Illogical Conditions** – Information within an update must be complete and logical. The e-OSCAR® system has built-in edits to prevent illogical conditions.
- **Time Service** – Information on the consumer's file is corrected more quickly – no mail time.

e-OSCAR®

THE TRADELINE BLOCK RESCISSION REQUEST PROCESS

Data furnishers may find it necessary to request a Tradeline Block Rescission Request as permitted under section 605B (c) (1) of the Fair Credit Reporting Act. The Tradeline Block Rescission Request Process (BRR) is used to request an account be returned to the file. BRR transactions are submitted through e-OSCAR®.

BLOCK RESCISSION REQUEST PROCESS VIA e-OSCAR®

The intent of the e-OSCAR® BRR process allows data furnishers to request one or more consumer reporting agencies return a consumer's account to the file. This can be in response to a Tradeline Block Notification that originated from one or more consumer reporting agency.

- When a Consumer Reporting Agency blocks tradeline information in a consumer's file that the consumer identifies as alleged identity theft, a Tradeline Block Notification is sent to the data furnisher via e-OSCAR®. If the data furnisher verifies that the account in question is not related to identity theft, they will use the e-OSCAR® system to request a BRR.
- The consumer reporting agencies receive their BRRs from e-OSCAR® and update the consumers' files as appropriate per their internal business processes.
- The consumer reporting agencies notify the data furnisher via e-OSCAR® in the event that they reinsert the tradeline information as a result of the submitted BRR.

e-OSCAR® Tradeline Block Rescission Process

- FEATURES OF BRR**
- **Ability to send to multiple CRAs** – Each data furnisher indicates an affiliation with one or more of the consumer reporting agencies at the time of registration. This affiliation can be updated at any time. If the data furnisher requests a Tradeline Block Rescission Request using the BRR process, e-OSCAR® sends the request to the consumer reporting agencies that the data furnisher designates when it submits the BRR. The data furnisher has the choice because it may not need to update an account on each of the consumer reporting agencies' databases.
 - **No Illogical Conditions** – Information within a rescission request must be complete and logical. The e-OSCAR® system has built-in edits to prevent illogical conditions.
 - **Time Service** – Accounts are reinserted to a consumer's file more quickly – no mail time.



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